REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

at

NOX-CRETE MANUFACTURING, INC.
1444 South 20th Street
Omaha, Nebraska 68108
(402) 341-2080

EPA ID Number: NED007284128

On

October 11 and 12, 2017

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Sciences and Technology Division

1.0 INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I performed a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) at Nox-Crete Manufacturing, Inc. (Nox-Crete), located in Omaha, Nebraska, on October 11 and 12, 2017. I conducted the inspection under the authority of RCRA Section 3007(a), as amended. During the inspection, I collected the information and data necessary to determine compliance with the applicable regulatory and statutory requirements. This report and attachments present the results of the inspection. I conducted the inspection as a Level B Multi-Media Inspection and the Multi-Media Screening Checklist is included as Attachment 1. Based on the information obtained during the course of the inspection, I inspected the facility as a Hazardous Waste (HW) Small Quantity Generator (SQG), used oil generator, and small quantity handler of universal waste (UW) lamps. Nox-Crete was last inspected by the Environmental Protection Agency (EPA) on October 20, 2009. Four violations were observed or cited as a result of the 2009 inspection.

2.0 PARTICIPANTS

Nox-Crete:

Mike Linn, President (about 35 years with the company)
Mike Cronin, Plant Manager (about 15 years with the company)
David MacFarlane, Quality Control Manager (about 40 years with company)
Eric Hansen, Operation Manager (about 3 months with company)
Joe Moritz, Lab Technician (about 15 years with company)
Laura Dooley, Lab Assistant (about 3.5 months with company)

Tom Gunter, Concrete Lab Technician (about 9 months with company)
Justin Eaton, Sprayer Technician (about 1 year with company)

U.S. Environmental Protection Agency (EPA):
Timothy Evans, Life Scientist, ENST

3.0 INSPECTION PROCEDURES

On October 11, 2017, at about 9:15 a.m., I arrived at Nox-Crete. A drive-by was conducted on the east perimeter of the facility. No apparent issues were observed while conducting the drive-by of the facility. I then proceeded to the front office, introduced myself, and asked for Mr. McFarlane, as the facility contact. I was told that Mr. MacFarlane was not available. After checking in, I was introduced to Mike Linn, President. I presented him with my business card, EPA identification, and credentials. Mr. Linn had Mr. Cronin join us for the in-briefing. I then explained the purpose and procedures of the inspection. As part of the in-briefing, I presented Mr. Linn with a copy of the *RCRA Facility Access Information Sheet*, March 2013, which provides inspection authority. I explained my need to collect accurate information and presented him with a copy of Title 18 U.S. Code, Sections 1001 and 1002. Mr. Linn was made aware of Nox-Crete's confidentiality rights and was informed that a *Confidentiality Notice* would be provided at the end of the inspection to make, or not to make, any claims. Mr. MacFarlane eventually joined the in-briefing, and acted as the primary facility representative.

During the inspection, discussions consisted of wastes generated and waste management practices. I conducted a visual inspection of the quality control (QC) lab, HW storage area, manufacturing areas, concrete lab, shipping warehouse, overstock warehouse, and the unused old boiler building.

Document photocopies and photographs were collected as inspection documentation (Attachments 1-13 and Photos 1-24 with attached photo log). Information collected during the inspection was documented in a field notes logbook and on the *Entry/Exit Checklist* (Attachment 2A). The records that were reviewed are as noted on the SQG inspection checklist (Attachment 2B), and as discussed below.

At the conclusion of the inspection, I summarized the findings and recommendations with Messrs. Linn, MacFarlane, Cronin, and Hansen. I provided Mr. MacFarlane with a *Confidentiality Notice* (Attachment 3), which he signed as acknowledgment of receipt. Mr. MacFarlane made confidentiality claims, on behalf of Nox-Crete, for photos taken during the inspection. According to Mr. Linn, descriptions of photos throughout this report would not be considered Confidential Business Information (CBI). I was also provided with copies of two Safety Data Sheets (Process Oils and Hyrdrocal 2000) which are not included as attachments in this report, but have been included with inspection photos as CBI material. I provided Mr. Cronin with a *Receipt for Documents and Samples* (Attachment 4) and a *Notice of Violation* (NOV) (Attachment 5), which he signed as acknowledgement of receipt. The following inspection documents and compliance assistance handouts were left with Nox-Crete:

Confidentiality Notice (Bottom, yellow page of the completed carbonless transfer set)
Receipt of Documents and Samples (Bottom, yellow page of the completed carbonless transfer set)
Notice of Violation (Top, white page of the completed carbonless transfer set)
Instructions for Responding to a Notice of Violation (EPA Handout)
Security Awareness (EPA Handout)
Commercial Motor Vehicle Transportation Security Planning (EPA Handout)
U.S. EPA Small Business Resources (EPA Handout)
EPA Industry Sector Notebooks List (EPA Handout)
EPA Compliance Assistance Centers (EPA Handout)
EPA Overview of the 2013 Solvent-Contaminated Wipes Final Rule (EPA Handout)
Nebraska DEQ Solvent-Contaminated Shop Towels, Rags, and Wipes (NDEQ Handout)

I followed the inspection procedures discussed in the RCRA CEI Standard Operating Procedure (No. 2321.1D), unless noted differently. Any authorized federal regulatory citations noted in this report are as adopted by reference in the authorized Nebraska regulations.

4.0 FINDINGS AND OBSERVATIONS

4.1 General Information/Facility Description/RCRA Status

Nox-Crete is a manufacturer of concrete construction chemicals. Products include, but are not limited to, form release agents, curing compounds, sealers, coatings, bond breakers, and caulking compounds. Nox-Crete products are sold through dealerships, worldwide.

The product manufacturing process involves mixing of surfactants, emulsifiers, refined synthetic oils, solvents, mineral spirits, and various pigments. Raw materials are received from off-site venders, by rail and truck, and stored in on-site tanks prior to mixing. Mixing tanks range in size from 500 to 5,000 gallons. Finished products are packaged in 1, 5, and 55-gallon containers and 250 and 330-gallon totes. According to Mr. Linn, Nox-Crete markets approximately 100 different products https://www.nox-crete.com/products-list/.

Nox-Crete is located in a mixed commercial and residential area in the south eastern portion of Omaha, Nebraska. Nox-Crete has been at this location for approximately 40 years. Nox-Crete operates out of two buildings. Offices, manufacturing, QC lab, concrete lab, and raw material and product warehouse, are located at 1444 S. 20th Street (Attachment 6B). Three buildings, including the shipping warehouse, overstock warehouse, and an unused old boiler building, are located to the east, on a contiguous site, directly across 20th Street (see Attachments 6A and 6B for aerial photo and facility layout, respectively) – there is no production or activity in the overstock warehouse and unused old boiler building. Mr. MacFarlane stated that currently Nox-Crete has between 35-45 full-time employees. Business hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. The facility also operates a swing shift from 3:00 p.m. to 11:00 p.m., Monday through Friday.

According to the Hazardous Waste Site Info Verification Report for Inspector form, Nox-Crete last notified on January 25, 2017, as an SQG of D001, D002, F003, and F005 HW (Attachment 7). Mr. Linn reviewed the Hazardous Waste Site Info Verification Report for Inspector form, which I provided to him during the inspection. Mr. Linn made no amendments to the form. Nox-Crete generates between 220 and 2,200 pounds of known hazardous waste per month, and routinely accumulates less than 13,200 pounds prior to shipping. Therefore, I determined Nox-Crete to be an SQG of D001, D002, and F003 HW. The facility lists waste code F005 on their notification, however it doesn't appear that Nox-Crete has generated or shipped any F005 HW. Mr. MacFarlane stated he would discuss the F005 waste code listed on the notification with Nox-Crete's consultant and vendor to determine if it is applicable to any waste generated at the facility. I also determined Nox-Crete to be a small quantity handler of universal waste-lamps and a used oil generator.

During review of facility documents related to stored HW, I noticed that Nox-Crete had generated greater than 2,200 lbs. of HW in September 2014, December 2016, and September of 2017 (Attachment 8). Nox-Crete notified as a Large Quantity Generator (LQG) (generating greater than 2,200 lbs./mo.) for December 2016 (Attachment 9). However, Nox-Crete had not notified as an LQG with the State of Nebraska, for HW generated in September 2014 and September 2017 (see NOV added after inspection, in Section 4.4.7, below). During the exit briefing, I mentioned to Messrs. Linn, MacFarlane, Cronin, and Hansen that Nox-Crete would need to notify the State of Nebraska regarding generating greater than 2,200 lbs. of HW in September 2014 and September 2017. The HW generated in September of 2014 and December 2016 was generated as a result of tank cleaning at the facility. The majority of the HW generated in September of 2017 was due to misformulation of a product called Sparkle Seal. Aside from the three episodic events listed above, Nox-Crete appears to be a Small Quantity Generator (SQG) (generating between 220 and 2,200 lbs./mo. of hazardous waste) and was an SQG at the time of my inspection.

4.2 Previous Inspections and Any Related Violations/Issues

10/20/2009 – Four violations cited, EPA Region 7.

1. Failure to close container of HW, as required by Title 128, Ch. 9, 007.04Al → 40 CFR 262.34(c)(l)(i).
2. Failure to post the location of spill control equipment near the telephone, as required by Title 128, Ch. 9, 007.09 B and C → 40 CFR 262.34(d)(5)(ii)(B) and (C).
3. Failure to make a hazardous waste determination, as required by Title 128, Ch. 4, 002 → 40 CFR 262.11.
4. Failure to close containers of universal waste lamps, as required by Title 128, Ch. 25, 012.04A → 40 CFR 265.273.13(d)(1).

10/26/1999 – One violation cited.
10/21/1991 – Two violations cited.

4.3 Waste Streams and Waste Management

Mixed Solvent HW - Xylene, mineral spirits, and ethyl acetate are used in the cleaning of various formulation tanks. Solvent used for cleaning a tank is able to be used as is in formulation of subsequent product batches. Approximately five gallons of solvent are used to clean a formulation tank. The five gallons of solvent used for cleaning a tank is stored in a bucket, prior to use in the next product batch. New product batches are manufactured approximately every week.

Coating pigments are mixed in a 20-gallon "bowl" located in the water room/Room 6. The bowl is cleaned with the same solvents used to clean formulation tanks. Solvent used to clean the coating pigment mixing bowl cannot be reformulated or used to make a product. However, the solvent can be used several times for cleaning before it becomes a waste. Mr. MacFarlane stated that approximately two gallons of solvent are used to clean the bowl. When solvent used to clean the coating pigment mixing bowl is spent, the solvent is placed in a 55-gallon satellite accumulation container. At the time of the visual inspection there was one approximately 1/3-full 55-gallon satellite accumulation container of spent solvent in the water room/Room 6. The container was in good condition, labeled with the words "Hazardous Waste", and closed. Mr. MacFarlane stated that once the satellite accumulation container is full it is moved to the less than 180/270 day HW container storage area. Mr. MacFarlane stated that between one and three 55-gallon containers of spent solvent are generated each month, depending on production rates.

Spent solvent is picked-up by Barton Solvents and Coal City Cob, then transported to WRR Environmental Services (WRR) in Eau Claire, Wisconsin as a D001 characteristic and F003 listed hazardous waste. According to Mr. MacFarlane, mixed solvents are fuel blended.

Spent Laboratory Solvents - Mr. Moritz stated that the QC laboratory is used primarily to test products to ensure that they meet specifications. Prior to being unloaded from railcars and tanker trucks, samples of raw material are also tested for quality assurance purposes. QC testing on raw material and finished products includes, but may not be limited to flash point, specific gravity, percentage of solids, acid number of product (a measurement of how well a product releases), viscosity, stability (visual), infrared, and reference scans.

Solvents used as part of QC testing and cleaning of lab equipment, include methanol, isopropyl alcohol, xylene, butanol, VMP naptha, ethyl acetate, aromatic 100, mineral spirits, and hexane. Spent solvents are collected in 5-gallon satellite accumulation area (SAA) containers located in the QC laboratory. At the time of the inspection, there were three partially full 5-gallon SAA buckets in the QC laboratory containing three different waste streams:

1. 50% Isopropyl Alcohol and 50% Soft Water Waste - generated as a result of acid number of product testing. The label on the SAA bucket described the waste as "Flammable Liquid".
2. HW Methanol and Clear Pre-Form
3. HW VMP Naptha, Isopropyl Alcohol, Ethyl Acetate, Xylene, Butanol, Aromatic 100, Mineral Spirits, and Hexane

The containers were all labeled, closed, and in good condition. According to Mr. MacFarlane, when SAA containers are full, the 5-gallon buckets are taken to the less than 180/270 day HW storage area. Spent laboratory solvent is picked-up by Barton Solvents and Coal City Cob, then transported to WRR Environmental Services (WRR) in Eau Claire, Wisconsin as D001 characteristic and F003 listed hazardous waste. According to Mr. MacFarlane, spent laboratory solvents are fuel blended.

Off-Specification Product – Product formulation errors occasionally result in generation of off-specification product. Nox-Crete may also occasionally receive outdated product from dealers or customers. Most off-specification or returned product can be reworked/used to make new product. However, some off-specification and returned products cannot be reworked and must be disposed.

If a solvent-based product cannot be used it is shipped as a D001 characteristic and F003 listed hazardous waste. Some D001 and F003 HW off-spec products generated at the facility include adhesives, misformulated solvents, and raw material. Corrosive off-spec products containing phosphoric acid have also been shipped as a D002 HW.

Mr. MacFarlane stated that if a water based product needs to be disposed (e.g. coatings, acrylic polymer, mold release compound, concrete sealer, aqueous based polyurethane, and water based paint) it will be profiled by WRR Environmental Services Co., Inc. and disposed as non-RCRA hazardous waste.

Nox-Crete generates approximately 150 gallons of HW and 150 gallons of non-HW off-spec product each month. Both HW and non-HW off-spec products are picked-up by Barton Solvents and Coal City Cob, then transported to WRR Environmental Services (WRR) in Eau Claire, Wisconsin for disposal. According to Mr. MacFarlane, off-specification products are fuel blended.

Cloth Rags and Paper Wipes - Cloth rags are used at the facility for, but not limited to, wiping down mixing tanks, cleaning test panels in the concrete lab, surface cleaning in the QC lab, and hand cleaning. Cloth rags had historically been laundered at the facility, according to the 2009 RCRA inspection report. However, Mr. Cronin stated that cloth rags used throughout the facility are now disposed in the general trash. During the inspection, I observed spent cloth rags inside, and on the side of, trash cans throughout the facility. Cloth rags are used with solvents for cleaning (concrete lab) and to clean up solvent spills and drippings (drum storage/Room 3 and EP Rooms/Rooms 5T and 5). Mr. McFarlane estimated that approximately 50 pounds of cloth rags, including solvent-contaminated cloth rags, are generated each month.

I also observed paper wipes being used in the QC lab. According to Mr. Moritz and Ms. Dooley, paper wipes are used to clean up solvent spills and for cleaning test equipment. Mr. Moritz and Ms. Dooley stated that approximately two pounds of paper wipes, including solvent-contaminated paper wipes, are generated in the QC lab each month. Paper wipes are allowed to dry on the edge of trash cans prior to being disposed in the general trash.

According to Mr. MacFarlane, trash is picked up when necessary (approximately weekly) by Waste Management and taken to the Pheasant Point Landfill, located in Elk City, Nebraska.

See Section 4.4 for information related to cloth rag and paper wipe waste determinations.

Tank Cleaning Wastewater - Water based formulation tanks are cleaned with a solution of bleach and water. The facility has determined the water/bleach solution and water based formulation tank residual to be non-hazardous through process knowledge. Mr. MacFarlane stated that water and bleach solution waste is disposed directly into the sewer, which is then treated at the City of Omaha publicly owned treatment works. Mr. MacFarlane stated that Nox-Crete generates approximately 100 gallons of bleach and water waste each month.

4 Ft. and 8 Ft. Waste Lamps – According to Mr. Cronin, Nox-Crete generates both 4-foot and 8-foot waste lamps, as part of facility maintenance. At the time of the inspection, Nox-Crete had no lamps in storage. Mr. Cronin stated that Nox-Crete had just shipped waste lamps off-site and had not generated any waste lamps since the last shipment. According to Mr. MacFarlane, approximately five 4-foot waste lamps and one 8-foot lamp are generated each month. When generated, waste lamps are stored in 4-foot and 8-foot fiber shipping containers in the annex/Room 11 (Attachment 6B). Waste lamps are managed as universal waste and are mailed to Waste Management in Williamston, South Carolina. Waste lamps are recycled through the LampTracker program.

Used Oil – Used oil and oil filters are generated as part of forklift maintenance. According to Mr. MacFarlane, Nox-Crete has their forklift trucks serviced by Clarklift in Omaha, Nebraska. Mr. MacFarlane stated that Clarklift takes all used oil and spent oil filters off-site after they conduct forklift maintenance. I informed Mr. MacFarlane that Nox-Crete would be considered a co-generator of the used oil. I did not determine the final disposition of used oil taken off-site by the contractor.

Aside from a small amount of thread cutting oil generated in the warehouse/Room W1, Mr. MacFarlane stated that no other used oil is generated by Nox-Crete.

Approximately 1.5 gallons of used oil is generated every six months. Used oil and filters are recycled through Product Recovery & Recycling, Inc. in Fort Calhoun, Nebraska.

Spent Oil-Based Products – (Hydrocal 200, Process Oils, Etc. and Cutting Oil) – Used oil-based products are generated in the warehouse/Room W1. Oil-based products are tested for viscosity with the use of Nox-Crete spray canisters. The oil-based product is sprayed into a 55-gallon drum located in the warehouse. I observed one 55-drum of spent oil-based products located in the warehouse/Room W1. The drum was approximately ¾-full. According to Mr. MacFarlane, the spent oil-based product cannot be reused. Nox-Crete has determined the spent oil-based products to be non-hazardous through process knowledge and the use of Safety Data Sheet (SDS).

Information regarding the monthly generation rate for spent oil-based products was not determined prior to submission of this report. Spent oil-based product is picked-up by Barton Solvents and Coal City Cob, then transported to WRR Environmental Services (WRR) in Eau Claire, Wisconsin for disposal. According to Mr. MacFarlane, spent oil-based products are fuel blended.

Other Waste Streams - Additional waste streams generated at the facility include:

- Waste Paint Related Material
- Tyvek Suits
- Nitrile Gloves
- Lead Acid Batteries - Forklift
- Oil-Contaminated Metal Shavings – Shipping Warehouse
- Cardboard
- Plastic/Polyethylene Wrap
- Floor Sweepings
- Pallets
- Office and General Trash

Additional information related to these waste streams is listed in the Waste Stream Table (Attachment 10).

At the time of the inspection, Nox-Crete was storing HW in drum storage/Room 3. SAA containers were observed in the QC lab and water room/Room 6. Universal waste lamps, when generated, are stored in the annex/Room 11.

4.4 Areas Visually Inspected and Any Related Violations/Issues

4.4.1 QC Lab/Room 2

Determine If Waste Is Hazardous Waste (NOV 1a) – *According to Title 128, Ch. 4, 002 → 40 CFR 262.11, a generator must make a hazardous waste determination on all solid waste.* During inspection of the QC lab/Room 2, I observed multiple paper wipes laying over the side of a trash can and a bucket (Photos 1 and 3, respectively). The paper wipes appeared to have previously been wet. I asked Mr. Moritz what paper wipes are used for in the lab. Mr. Moritz stated that paper wipes are used to clean up solvent spills, cleaning lab equipment, and wiping hands. Mr. Moritz stated that he and Ms. Dooley place solvent-contaminated paper wipes on the side of the trash can and the bucket to dry/evaporate, prior to disposal in the trash. According to Mr. Moritz and Ms. Dooley, paper towels may contain any one of, or combination of, butanol, aromatic 100, xylene, methanol, isopropyl alcohol, and mineral spirits. Mr. Moritz and Ms. Dooley estimated that they generate approximately two pounds of paper wipes, including solvent-contaminated paper wipes, in the QC lab, each month.

Based upon how the facility was managing the solvent-contaminated paper wipes, it appeared that Nox-Crete determined the wipes to be non-hazardous waste.
However, it is unknown whether the solvent-contaminated paper wipes would have been D001 and F003 HW at the point of generation, prior to evaporation. Therefore, I cited the violation for an inadequate waste determination.

Treating Without a Permit (NOV Added After Inspection) - *According to Title 128, Ch. 12, 001.01 A permit is required for the treatment, storage, or disposal of any hazardous waste identified or listed in Chapters 2 and 3. Owners or operators of hazardous waste management units must have permits during the active life (including the closure period) of the unit.* During inspection of the QC lab/Room 2, I observed a cloth rag placed in a funnel attached to a HW SAA container of spent laboratory solvents (Photo 2). The SAA container is used to accumulate spent mineral spirits, butanol, xylene, ethyl acetate, isopropyl alcohol, aromatic 100, vmp naptha, and hexane generated as a result of cleaning lab equipment and conducting tests. Waste codes associated with spent laboratory solvents includes D001 and F003. I asked Mr. Moritz how the cloth rag in the funnel was used. Mr. Moritz stated that the cloth rag was used to absorb, primarily, spent VMP naptha, isopropyl alcohol, and ethyl acetate used for cleaning and testing in the lab. I asked Mr. Moritz if the rag served a purpose, such as being used to filter solids from spent solvents. Mr. Moritz stated that spent solvent is poured on the cloth rag, while it is in the funnel, to dispose of solvent, through evaporation. Mr. Moritz stated that any excess liquid not absorbed by the cloth rag is collected in the SAA container attached to the funnel.

4.4.2 Drum Storage/Room 3

The less than 180/270-day hazardous waste container storage area is located in drum storage/Room 3 (see Attachment 6B). I observed the following 14 drums in storage:

- Ten 55-gallon drums containing mixed solvents
- Three 55-gallon drums containing Silcoseal 2F Concentrate (off-spec product)
- One 55-gallon drum containing waste paint related material

All of the drums appeared to be in good condition, were labeled with the words "Hazardous Waste", and were closed. The dates on the hazardous waste storage containers ranged from 8/5/17 to 10/2/17. A list of the drums, in storage at the time of the inspection, is included as Attachment 8. I asked Mr. Cronin if drums of hazardous waste are inspected. Mr. Cronin stated that drums are inspected weekly.

Determine If Waste Is Hazardous Waste (NOV 1b) – *According to* Title *128, Ch. 4, 002 → 40 CFR 262.11, a generator must make a hazardous waste determination on all solid waste.*
During inspection of drum storage/Room 3, I observed cloth rags on the side of a trash can (Photo 13). I asked Mr. Cronin how the cloth rags had been used. Mr. Cronin stated that cloth rags and paper wipes are used to wipe off tanks, clean up solvent dripping from product tanks, and wipe off employee hands. Solvents used in manufacturing products includes, but is not limited to, methanol, isopropyl alcohol, xylene, butanol, VMP naptha, ethyl acetate, aromatic 100, mineral spirits, and hexane. I asked Mr. Cronin how he disposed of rags when they are no longer able to be used. Mr. Cronin stated that cloth rags are allowed to dry on the edge of trash

cans prior to being disposed in the trash. Mr. Cronin stated that Nox-Crete was trying to avoid spontaneous combustion associated with any solvent-contaminated cloth rags or paper wipes. Mr. Cronin and Mr. MacFarlane stated that approximately 50 lbs. of spent cloth rags are generated each month. The location of the solvent-contaminated cloth rags and wipes, associated NOV 1b, was inadvertently listed on the notice left with the facility as EP Room/Room2.

Based upon how the facility was managing the solvent-contaminated cloth rags, it appeared that Nox-Crete determined the wipes to be non-hazardous waste. However, it is unknown whether the solvent-contaminated cloth rags would have been D001 and F003 HW at the point of generation, prior to evaporation. Therefore, I cited the violation for an inadequate waste determination.

HW Container Not Dated (NOV 2a and b) - *Failure to have the date upon which each period of accumulation begins clearly marked and visible for inspection on each container as required by Title 128, Ch. 9, 007.03D → 40 CFR 262.34(a)(2).* During inspection of drums in the less than 180/270-day hazardous waste container storage area, I saw two drums that were not labeled with HW accumulation start dates:

a. One 55-gallon drum of HW mixed solvents (Photo 4)
b. One 55-gallon drum of HW Silcoseal 2F Concentrate (off-spec product) (Photo 6)

I asked Mr. Cronin about the drums with missing accumulation start dates. Mr. Cronin stated that there were other drums containing the same HW, generated at the same time, and that he had overlooked marking the accumulation start dates on the two drums. Mr. Cronin marked the two drums with accumulation start dates, correcting NOVs 2a and 2b at the time of the inspection (Photos 5 and 7).

Location of Spill Control Material Not Posted Next to Telephone (NOV 4) – *According to Title 128, Ch. 9, 007.09 B → 40 CFR 262. 34(d)(5)(ii)(B), the location of spill control material must be posted next to a telephone.* During inspection of the less than 180/270-day hazardous waste container storage area, in drum storage/Room 3, I observed a fire evacuation map posted on a concrete pillar (Photo 22). The map listed the locations of fire extinguishers and exits at the facility. The name and telephone number of the emergency coordinator and fire department were listed on another piece of paper next to a phone in the water room/Room 6, adjacent to drum storage/Room 3. However, the location of spill control equipment was not posted in either drum storage/Room 3 or the water room/Room 6.

Mr. Cronin and I checked some other phones, throughout the facility, and were not able to find a phone with the required spill control material locations posted. During the inspection, Mr. Cronin amended the fire evacuation map, adding the locations of spill control material at the facility (Photo 23). The updated fire evacuation map, showing the location of spill control material, was posted next to the water room/Room 6 phone (Photo 24). I considered NOV 4 to be corrected during the time of the inspection.

4.4.3 Concrete Lab/Room 9

Determine If Waste Is Hazardous Waste (NOV 1c) – *According to 128, Ch. 4, 002 → 40 CFR 262.11, a generator must make a hazardous waste determination on all solid waste.* During inspection of the concrete lab/Room 9, I asked Mr. Gunter if he used cloth rags for cleaning. Mr. Gunter stated that he used mineral spirits on cloth rags to remove excess oil from test panels. I asked Mr. Gunter what he does with cloth rags after he uses them. Mr. Gunter stated that he lays the cloth rags over the side of a trash can, or a bucket, to allow the rags to dry. Mr. Gunter stated that after the cloth rags are dry he disposes of cloth rags in the trash. Mr. Gunter stated that he uses approximately 6-10 rags, with mineral spirits, each month.

Based upon how the facility was managing the solvent-contaminated cloth rags, it appeared that Nox-Crete determined the cloth rags to be non-hazardous waste. However, it is unknown whether the solvent-contaminated cloth rags would have been D001 and F003 HW at the point of generation, prior to evaporation. Therefore, I cited the violation for an inadequate waste determination.

4.4.4 Raw Material Storage/Room 7

Determine If Waste Is Hazardous Waste (NOV 1d, e, f, and g, respectively) – *According to 128, Ch. 4, 002 → 40 CFR 262.11, a generator must make a hazardous waste determination on all solid waste.* During inspection of raw material storage/Room 7, I observed four buckets containing unknown material:

- One rusty metal 5-gallon bucket, with a white plastic container inside, containing approximately ½-gallon of white crystals and other debris (Photos 14-16). This was cited as NOV 1d on the notification provided to the facility.
- One metal 5-gallon open bucket containing approximately one gallon of unknown brown solids (Photos 17 and 19). This was cited as NOV 1e on the notification provided to the facility.
- One white plastic 5-gallon open bucket containing approximately 1.5 gallons of red liquid and solids (Photos 17 and 18). This was cited as NOV 1f on the notification provided to the facility.
- One white plastic 5-gallon open bucket containing approximately five lbs. of unknown brown solids and nitrile gloves (Photos 20 and 21). This was cited as NOV 1g on the notification provided to the facility.

I asked Mr. Cronin if he knew what the material was in each of the buckets described above. Mr. Cronin did not know what the material was in each of the buckets. I asked Mr. Cronin if a waste determination needed to be made for the material in the buckets. Mr. Cronin stated that a waste determination did need to be made for the contents of the buckets.

4.4.5 EP Rooms/Room 5T and 5

Determine If Waste Is Hazardous Waste (NOV 1h) – *According to 128, Ch. 4, 002 → 40 CFR 262.11, a generator must make a hazardous waste determination on all solid waste.* During inspection of an EP Room/Room 5 trash can, I observed a 1-quart metal can containing

approximately six ounces of liquid (Photos 11 and 12). The container was labeled Cure and Seal 1315 A. I requested a Safety Data Sheet (SDS) for Cure and Seal 1315 A (Attachment 11). According to the SDS, Cure and Seal 1315 A would be considered an ignitable HW when disposed. I asked Mr. Cronin if the liquid in the can was the same as that listed on the label. Mr. Cronin was not sure. I asked Mr. Cronin if he knew who might have disposed of the can. Mr. Cronin did not know who had disposed of the can and liquid. I asked Mr. Cronin if a waste determination needed to be made for the liquid in the can. Mr. Cronin stated that a waste determination did need to be made for the contents of the can.

HW Container Not Labeled with the Words "Hazardous Waste" (NOV 3) - *Failure to clearly label or mark container with the words "Hazardous Waste", as required by Title 128, Ch. 9, 007.03D → 40 CFR 262.34(a)(3).* During inspection of the EP Room/Room 5, I observed a white plastic 5-gallon bucket being used to actively collect dripping product from a storage tank (Photo 8). I asked Mr. Cronin what was leaking from the tank (Photo 9). Mr. Cronin stated that a packing gland was leaking on the Silcoseal 2F Concentrate product tank. See Attachment 12 for a copy of the Silcoseal 2F Concentrate SDS. I asked Mr. Cronin if the Silcoseal 2F Concentrate in the bucket could be used or added back into the product tank. Mr. Cronin stated that the Silcoseal being collected in the bucket could not be reused, and would be added to a 55-gallon HW storage drum. The 5-gallon bucket contained approximately 2.5-gallons of HW Silcoseal 2F Concentrate (off-specification product) and was not labeled with the words "Hazardous Waste".

During the inspection, Mr. Cronin was able to fix the Silcoseal tank packing gland. Mr. Cronin also removed the 5-gallon bucket of HW Silcoseal from under the leaking packing gland and added it to a 55-gallon HW storage drum in the less than 180/270 day HW storage area. Therefore, I considered NOV 3 to be corrected at the time of the inspection (Photo 10).

4.4.7 Records Review

Mr. MacFarlane assisted with the records review. No issues were observed during review of the following documents:

- A total of 16 HW shipping manifests, including:
  - 007680130 FLE, dated 1/30/15
  - 0082337802 FLE, dated 4/24/15
  - 006013394 FLE, dated 9/28/15
  - 004537773 FLE, dated 12/22/15
  - 008947013 FLE, dated 12/22/15
  - 008900837 FLE, dated 6/10/16
  - 009847131 FLE, dated 11/23/16
  - 005152544 FLE, dated 1/23/16
  - 008900838 FLE, dated 11/23/16
  - 005152541 FLE, dated 11/23/16
  - 009848647 FLE, dated 11/23/16
  - 010449893 FLE, dated 12/23/16
  - 009848646 FLE, dated 12/23/16

  - 006013395 FLE, dated 6/14/17
  - 010449889 FLE, dated 6/14/17
  - 010449892 FLE, dated 6/14/17
- Five bill of lading for shipments of non-hazardous/non-regulated waste, dated 4/24/15, 12/22/15, 11/23/16, and two on 6/14/17.
- Personnel training documentation
- Hydrocal 200 SDS
- Process Oils SDS

Employees Not Familiar with Proper Waste Handling (NOV 5) – *According to 128, Ch. 9, 007.10 → 40 CFR 262.34(d)(5)(iii), a generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures.* During review of the past three years of HW training documentation, I noticed that Mr. Moritz, QC lab, had not attended any Hazardous Waste Management/Generator training for years 2015, 2016, or 2017 (Attachment 13). Although retention of training documentation is not required for Nox-Crete as an SQG, the training sign-in sheets are important in showing that employees who routinely handle HW are not attending training. As mentioned in this report, Mr. Moritz uses a variety of solvents for cleaning and testing in the QC lab. Spent laboratory solvents are routinely generated within the QC lab, and are managed as D001 and F003 HW. Mr. Moritz stated that spent solvent is poured on a cloth rag, located in a SAA container funnel, and is allowed to evaporate as a means of disposal (Photo 2). It was not clear how long Mr. Moritz had been intentionally evaporating D001 and F003 spent laboratory solvents.

Based upon how QC lab personnel managed spent solvent, by treating solvent through evaporation, it did not appear that they were adequately trained or familiar with proper waste handling.

Notification Not Updated (NOV Added After Inspection) - *According to Title 128, Chapter 4, 003.02, Not later than thirty days after any change in the information or status of any person as described to the Department or EPA in Section 003 of this Chapter, such person shall file an amended notification with the Department.* During review of facility documents related to stored HW, I noticed that Nox-Crete had generated greater than 2,200 lbs. of HW in September 2014, December of 2016, and September of 2017 (see Attachment 8). Nox-Crete notified as a Large Quantity Generator (LQG) (generating greater than 2,200 lbs./mo.) for December 2016 (Attachment 9). However, Nox-Crete had not notified as an LQG, with the State of Nebraska, for HW generated in September 2014 and September 2017.

5.0 SUMMARY

I inspected Nox-Crete as an SQG of HW, small quantity handler of universal waste, and used oil generator. Nox-Crete has one HW storage area and multiple HW SAA containers. The SQG requirements reviewed during this inspection are discussed above and are noted on the SQG checklist included as Attachment 2B.

The following apparent violations/issues were noted as discussed above:

NOV 1 – Failure to make a hazardous waste determination, for the following waste streams, as required by Title 128, Ch. 4, 002 → 40 CFR 262.11:

a. Solvent-contaminated paper towels and cloth rags in QC lab/Room 2.
b. Solvent-contaminated paper towels and cloth rags in drum storage/Room 3.
c. Solvent-contaminated paper towels and cloth rags in concrete lab/Room 9.
d. One rusty metal 5-gallon bucket, with white plastic container inside, containing approximately ½-gallon of white crystals and other debris in raw material storage/Room 7.
e. One metal 5-gallon open bucket containing approximately one gallon of unknown brown solids in raw material storage/Room 7.
f. One white plastic 5-gallon open bucket containing approximately 1.5 gallons of red liquid and solids in raw material storage/Room 7.
g. One white plastic 5-gallon open bucket containing approximately five lbs. of unknown brown solids and nitrile gloves in raw material storage/Room 7.
h. One metal 1-quart container with approximately six ounces of liquid in EP Room/Room 5 trash can.

NOV 2 – Failure to mark or label hazardous waste with an accumulation start date, for the following containers, as required by Title 128, Ch. 9, 007.03D → 40 CFR 262.34(a)(2):

a. One 55-gallon drum of HW Silcoseal, located in drum storage/Room 3.
b. One 55-gallon drum of HW mixed solvents, located in drum storage/Room 3.

NOV 3 – Failure to mark or label containers holding hazardous waste with the words "Hazardous Waste", as required by Title 128, Ch. 9, 007.03D → 40 CFR 262.34(a)(3), for one white plastic 5-gallon bucket containing approximately 2.5-gallons of HW Silcoseal in EP Room/Room 5.

NOV 4 – Failure to post next to a telephone the location of spill control material, as required by Title 128, Ch. 9, 007.09B → 40 CFR 262.34(d)(5)(ii)(B).

NOV 5 – Failure to familiarize employees with proper waste handling, as required by Title 128, Ch. 9, 007.10 → 40 CFR 262.34(d)(5)(iii).

NOV added after the inspection

- Failure to obtain a permit for the treatment, storage, or disposal of any hazardous waste identified or listed in Chapters 2 and 3 as required by Title 128, Ch. 12, 001.01.
- Failure to update generator registration form if the information filed with the department changes, as required by Title 128, Chapter 4, 003.02.

Other than the items noted above, no other apparent violations were noted. However, the EPA may be reviewing my findings further after the inspection, which may change or add to my findings.

Timothy R. Evans
Life Scientist
Date: 11-21-17

Attachments

1. Multi-media Screening Checklist (2 pages)
2. Checklists
   A. Entry/Exit (2 pages)
   B. SQG Checklist (4 pages)
3. Confidentiality Notice (1 page)
4. Document of Receipt (1 page)
5. NOV (3 pages)
6. Facility Layout
   A. Aerial Photo (1 page)
   B. General Facility Layout (2 pages)
7. Hazardous Waste Site Info Verification Report for Inspector (2 pages)
8. Hazardous Waste Drum Tracking Sheets (3 pages)
9. Letters to and from State of Nebraska (2 pages)
10. Waste Stream Table (6 pages)
11. Cure and Seal 1315 A SDS (8 pages)
12. Silcoseal 2F Concentrate SDS (8 pages)
13. Hazardous Waste Management/Generator training for years 2015, 2016, or 2017 (3 pages)
14. E-mail to Facility - Additional Citations (1 page)

Photo Log (4 pages)
Photos (12 pages / 24 photos) (claimed CBI)

Forward To: EPCRA / RMP / TSCA ☑ CWA ☒ Wetlands ☐ UIC ☐ PWS ☐ CAA ☐ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: NOX-CRETE MANUFACTURING, INC.
Facility Ownership: NOX-CRETE PROPERTIES, INC.
Street: 1444 SOUTH 20TH STREET
City: OMAHA State: NE Zip: 68108
Phone (402)341-2080 Facility Contact: DAVID McFARLANE
Number of Employees: ~35 Work Hours/Shifts 8-5 M-F 3-11 SWING SHIFT Facility Subject to OSHA regulations Yes ☑ No ☐

Inspector TIMOTHY R. EVANS
Primary Media: RCRA
Inspector Phone Ext.: 7663
Date: 10-11-12-17
SIC/NAICS Code

Main facility activity, major process chemical(s) & description: MANUFACTURE CONCRETE CONSTRUCTION CHEMICALS

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☒, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☒, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐, other_____).

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ *Forward to EPCRA*
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☒ *Forward to EPCRA*
3. Has the facility: *If any box in question 3 is marked - Forward to EPCRA*
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☒ (stop) Yes ☐ *Forward to PCB and ask* Has facility tested oil filled equipment to determine PCB content; No ☑ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☒ Yes ☐ – *Get Photo*

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any water/wastewater to storm sewers, surface water, or the land? No ☐ (stop) Yes ☒
   If yes, are all water/wastewater discharges permitted? Yes ☐ No ☒ *Forward to CWA*
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
   If yes, are the discharges permitted by: State? ☐, City? ☐ – If yes, Stop here. No ☐ *Forward to CWA*
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ *Forward to CWA*
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☒ (stop) Yes ☐
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ *Forward to CWA*
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (*Get Photo*) *Forward to CWA*
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☑ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
   No ☐ (stop) Yes ☐ - Identify location and timeframe_____ (*Get Photo*) *FWD to Wetlands*

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☒ (stop) Yes ☐ *Forward to UIC*
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☒ (stop) Yes ☐ *Forward to PWS*
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA)

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☒ Yes ☐ *Forward to CAA*
   Source_____ (*Get Photo*)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☐ (stop) Yes ☐
   If yes, is equipment permitted? Yes ☐ No ☐ *Forward to CAA Describe:*_____
3. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☒ (stop) Yes ☐ *Forward to EPCRA/RMP*

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☐ (stop) Yes ☐
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ *Forward to RCRA*
2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ *Forward to RCRA*
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

Material Claimed To Be Non-Hazardous	How does the facility know these wastes are non-hazardous?
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ *Forward to RCRA*
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ *Forward to RCRA*

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☐ Yes ☐ *Forward to RCRA*
   Describe:_____ (*Get Photo*)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☐ Yes ☐ *Forward to RCRA*
   Describe:_____ (*Get Photo*)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☒ Yes ☐ *Forward to RCRA &* **EPCRA** Describe:_____ (*Get Photo*)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☒ Yes ☐ *Forward to UST*
8. Does the facility have any underground fuel tanks for emergency generators? No ☒ Yes ☐ *Forward to UST*

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☐ (stop) Yes ☒ - Does the facility have a certified SPCC Plan? Yes ☒ No ☐ *Forward to SPCC*
   If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ *Forward to SPCC*
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☒ Yes ☐ (*Get Photo*) *Forward to SPCC*

** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS*

Facility: NOX-CRETE MANUFACTURING INC. Date: 10-11-12-17 Arrival time: 9:15 A.M.

DRIVE-BY

1 Drive-by conducted from public right-of-way? ☐ Yes ☐ No

Facility Orientation

2 Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way) → 5 ACRES

3 Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☐ No

- Containers	- Tanks	- Processing Equipment
- Loading Areas	- Unloading Areas	- Security Devices
- Open Drums	- Stressed Vegetation	- Unusual Staining
- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns	

SITE ENTRY AND INBRIEFING

1 ☐ Used main entrance ☐ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☐ No

2 Facility Representative(s) MICHAEL LINN Title PRESIDENT ~35 YRS.

MIKE CRONIN Title PLANT MANAGER 15 YRS.

DAVID McFARLANE QC MANAGER 40 YRS

3 Does representative have intimate knowledge of all waste management practices? ☐ Yes ☐ No How long in position? _____

4 Introduction:

☒ Presented credentials
☒ Verified presence at correct facility (checked address/I.D. #)
☒ Explained authority to conduct inspection (Section 3007 of RCRA)
☒ Explained the purpose, scope, and order of the inspection
☒ Explained documentation process - worksheets, checklists, photo's, notes, statements, etc
☐ Explained facility's right to claim CBI
☐ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
☐ Identified personal safety considerations: _____
☐ Completed Multimedia screening checklist
☐ Provided SBREFA handout
☐ Obtained GPS reading

5 Was full access granted? ☒ Yes ☐ By facility representative Other (name): _____

☐ No - Access denied Name of person denying access: _____ Time of denial: _____

Reason for denial, or limitations placed on access:

EXIT BRIEFING

1 Reviewed all data collected and documented all concerns or violations? ☐ Yes ☐ No

- Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
- Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information
- Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity

☐ Identified/verified violations from previous inspection were corrected (if applicable)
☐ Addressed all unresolved inspection related issues
☐ Summarized findings and observations for the facility representatives

NOV issued? ☒ Yes ☐ No ☐ Violations clearly identified and explained, including circumstances, location, and applicable regulations

☐ Explained the importance of a timely (14 day) and adequate response
☐ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☐ Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
☐ Explained that recommendations provided are for informational purposes only and *DO NOT* require specific actions by the facility
☐ Provided facility with CBI form
☐ Prepared Document Receipt form

3 Specific information requested from facility? ☐ Yes ☐ No _____

4 Facility appears to have awareness of RCRA regulations and/or has its own environmental staff? ☐ Yes ☐ No

Facility has copy of applicable regulations? ☐ Yes ☐ No

6 Attitude and demeanor of facility representative(s) ☑ OK ☐ Not OK _____

Compliance Asst Doc Provided:

EPA Industry Sector Notebooks List
Compliance Asst Ctrs
SBREFA & Supplemental Info
Security Awareness & for Transporters

T.E. 10.12.17 ~~Homeland Security Chemical Facility Anti-Terrorism Std~~

EPA OVERVIEW OF THE 2013 SOLVENT-CONTAM WIPES FINAL RULE

NEBRASKA DEQ SOLVENT-CONTAMINATED SHOP TOWELS, RAGS, AND WIPES

EXIT BRIEFING PARTICIPANTS

1. David MacFarlane
2. Michael Linn
3. Michael Crowin
4. Eric Hansen

UNLAWFUL TREATMENT

NOX-CRETE MANUFACTURING INC.
1444 SOUTH 20TH ST. OMAHA, NE 68108
EPA ID # NED 004 284 128

Updated 3/29/2017 by MXW

SMALL QUANTITY GENERATOR CHECKLIST
(Title 128 – Chapter 9)

INSPECTOR: TIMOTHY R. EVANS
10-11-12-17

Applicability and General Requirements (001 through 007)

- Has a hazardous waste determination been made for all waste streams generated at the facility by testing the waste or using knowledge of process? **Ch 4, 002 → 262.11** — ☐ Yes ☒ No ☐ NA ☒ NOV #1
- Does the generator keep records of any test results, waste analyses or other waste determinations? **Ch 4, 005.03C → 262.40(c)** — ☐ Yes ☐ No ☐ NA ☐ NOV
- Does the facility generate and/or accumulate:
  - A total quantity of hazardous waste greater than 100 kg and less than 1000 kg per month? **Ch 9, 001.01** — ☒ Yes ☐ No ☐ NA
  - Less than 1 kg of acute hazardous waste per month? **Ch 9, 004.01** — ☐ Yes ☐ No ☒ NA
  - Less than 100 kg of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill of any acute hazardous waste per month? **Ch 9, 004.02** — ☐ Yes ☐ No ☒ NA
  - Less than 6000 kg of hazardous waste or excluded quantities of acute hazardous waste at any time? **Ch 9, 007.03A → 262.34(d)(1) [262.34(f)]** — ☐ Yes ☐ No ☒ NA ☐ NOV
  - Waste for more than 180 days or more than 270 days if transported over 200 miles? **Ch 9, 007 → 262.34(e) [262.34(f)]** — ☐ Yes ☒ No ☐ NA ☐ NOV
  - Has the facility obtained a DEQ/EPA Identification Number? **Ch 4, 003.01 → 262.12(a)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Has the facility status or activity changes occurred? — ☐ Yes ☐ No ☐ NA
- Are any of the following wastes generated at the site:
  - Wastes managed in elementary neutralization units, wastewater treatment units or totally enclosed treatment facilities? **Ch 9, 002.02 → 265.1(c)(9) & (10)** — ☐ Yes ☒ No ☐ NA ☐ NOV
  - Scrap metal? — ☒ Yes ☐ No METAL SHAVINGS
  - Used oil? — ☒ Yes ☐ No "
  - Spent lead acid batteries? — ☐ Yes ☒ No
  - Universal waste? — ☒ Yes ☐ No LAMPS
  - Spent materials that are reclaimed and reused on-site? **Ch 2, 008.25 →261.4(a)(23)** — ☐ Yes ☐ No ☐ NA ☐ NOV
- Does the generator treat, store or dispose hazardous waste onsite? **Ch 9, 001.02 → 270.1(c)** — ☐ Yes ☐ No ☐ NA ☐ NOV

Accumulation/Pre-transport/Satellite Accumulation Requirements (007)

- Is waste placed in tanks? **Ch 9, 007.03B → 262.34(a)(1)(ii)** — ☐ Yes ☒ No ☐ NA ☐ NOV
- Are waste accumulation containers
  - In good condition? **Ch 9, 007.03C per Ch 10, 004.01A1 → 262.34(c)(1)(i) per 265.171** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Closed except when adding or removing waste? **Ch 9,007.03C per Ch 10, 004.01A2 → 262.34 (c)(1)(i) per 265.173(a)** — ☒ Yes ☐ No ☐ NA ☐ NOV
    AREA 7 BLASTOFF OR BIO-CLEAN
  - Opened, handled or stored in a manner that may rupture or cause them to leak? **Ch 9,007.03C per Ch 10, 004.01A3 → 262.34(a)(1)(i) per 265.173(a)** — ☐ Yes ☒ No ☐ NA ☐ NOV
  - Clearly marked with a date of accumulation? **Ch 9,007.03D per Ch 10, 004.01F →262.34(a)(2)** — ☐ Yes ☒ No ☐ NA ☒ NOV
  - Clearly marked with the words "Hazardous Waste"? **Ch 9,007.03D per Ch 10, 004.01G →262.34(a)(3)** — ☐ Yes ☒ No ☐ NA ☒ NOV
- Does the generator inspect areas where containers are stored at least weekly looking for leaks and for deterioration? **Ch 9,007.03C per Ch 10, 004.01A4 → 262.34(a)(1)(i) per 265.174** — ☒ Yes ☐ No ☐ NA ☐ NOV

- Are "No Smoking" signs conspicuously placed wherever there is a hazard from ignitable or reactive waste? **Ch 9,007.03E per Ch 16, 001.01 → 265.17(a)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Are hazardous wastes placed in unwashed containers that previously held incompatible wastes or materials? **Ch 9,007.03E per Ch 16, 001.03 → 262.34(a)(1)(i) per 265.177(b)** — ☐ Yes ☐ No ☒ NA ☐ NOV
- Are incompatible wastes placed in the same containers? **Ch 9,007.03E per Ch 16, 001.04 → 262.34(a)(1)(i) per 265.177(a)** — ☐ Yes ☒ No ☐ NA ☐ NOV
- Are containers of incompatible wastes separated from other materials by a dike, berm or wall? **Ch 9,007.03E per Ch 16, 002.01B → 262.34(a)(1)(i) per 265.177(c)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Does the generator package, label and mark waste in accordance with DOT requirements? **Ch 9, 007.12A – 12C → 262.30 – 32** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Are satellite accumulation areas at or near the point of generation? **Ch 9, 007.04A → 262.34(c)(1)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Are satellite accumulation areas under the control of the operator of the process generating the waste? **Ch 9, 007.04A → 262.34(c)(1)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Does the satellite accumulation area exceed a total of 55-gallons of hazardous waste per waste stream or one quart of acutely hazardous waste at any time? **Ch 9, 007.04B → 262.34(c)(1)** — ☐ Yes ☒ No ☐ NA ☐ NOV
- If yes, did the generator:
  - Comply within three days with the container accumulation requirements of Chapter 10 (i.e., good condition, closed, weekly inspections, ignitable, incompatible or reactive wastes, marked with the words "Hazardous Waste") with respect to the excess amount of waste? **Ch 9, 007.04B per Ch 10, 004.01 → 262.34(c)(2)** — ☐ Yes ☐ No ☒ NA ☐ NOV
  - Mark the container holding the excess waste with the date the excess waste began accumulating? **Ch 9, 007.04B → 262.34(c)(2)** — ☐ Yes ☐ No ☒ NA ☐ NOV
- Are satellite accumulation area containers:
  - In good condition? **Ch 9, 007.04A1 per Ch 10, 005.01A → 262.34(c)(1)(i) per 265.171** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Closed except when adding or removing waste? **Ch 9, 007.04A1 per Ch 10, 005.01A → 262.34(c)(1)(i) per 265.173(a)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Made of or lined with materials compatible with the hazardous waste? **Ch 9, 007.04A1 per Ch 10, 005.01A → 262.34(c)(1)(i) per 265.172** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Marked with the words "Hazardous Waste" or other words that identify the contents of the container? **Ch 9, 007.04A2 → 262.34(c)(1)(ii)** — ☒ Yes ☐ No ☐ NA ☐ NOV

Used Oil Storage Requirements (Chapter 7, 009)

- Are containers and aboveground tanks used to store used oil:
  - In good condition? **Ch 7, 009.04 A1 → 279.22(b)(1)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Not leaking? **Ch 7, 009.04A2 → 279.22(b)(2)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Labeled or clearly marked with the words "Used Oil"? (volume of 25 gallons or greater) **Ch 7, 009.04A3 → 279.22(c)** — ☒ Yes ☐ No ☐ NA ☐ NOV

Manifest System (007)

- Does the facility use a manifest for shipments of hazardous waste? **Ch 9, 007.06 per Ch 10, 002 & 004.06 → 262.20(a)(1)** ☒ Yes ☐ No ☐ NA ☐ NOV
- Is the generator's waste reclaimed under a contractual agreement? ☐ Yes ☒ No ☐ NA
- If yes is a copy of the reclamation contract specifying the type of waste and frequency of shipment kept on file for 3 years after termination or expiration of the agreement? **Ch 9, 007.06A & 06C → 262.20(e)(1) & (2)** ☐ Yes ☐ No ☒ NA ☐ NOV
- Did the generator submit a copy of the manifest to the NDEQ if a signed copy was not received within 60 days of the date the waste was accepted by the initial transporter? **Ch 4, 005.02C → 262.42(b)** ☐ Yes ☐ No ☒ NA ☐ NOV
- Are manifests and Exception Reports retained for 3 years? **Ch 4, 005.03A & 03B → 262.40(a)** ☒ Yes ☐ No ☐ NA ☐ NOV
- Does the facility export hazardous waste? **Ch 9, 007.05 per Ch 10, 006 → 262 Subpart E** ☐ Yes ☒ No ☐ NA ☐ NOV
- Does the facility ship by rail or water? **Ch 9, 007.06 per Ch 10, 002.11 & 12 → 262.23(c) & (d)** ☐ Yes ☒ No ☐ NA ☐ NOV

Land Disposal Restrictions (Chapter 20)

T.E. 10.11.17

- Does the generator ship restricted waste off-site for treatment or disposal? **Ch 20, 001.03 → 268.7(a)(6)** ☒ Yes ☒ No ☐ NA
- If yes, did a Land Disposal Restriction Notification accompany each waste shipment manifest? **Ch 20, 005.01 → 268.7(a)(9)(i)** ☒ Yes ☐ No ☐ NA ☐ NOV

Emergency Equipment/Procedures/Coordination (007)

- Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment at the site? **Ch 17, 002 → 265.31** ☐ Yes ☒ No ☐ NA ☐ NOV

  MENTION AREA IN EP ROOM HOUSEKEEPING
- Is the generator site equipped with the following:
  - An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal)? **Ch 17, 003.01 → 265.32(a)** ☒ Yes ☐ No ☐ NA ☐ NOV
  - A device capable of summoning external emergency assistance such as a telephone or a hand-held two-way radio? **Ch 17, 003.02 → 265.32(b)** ☒ Yes ☐ No ☐ NA ☐ NOV
  - Portable fire extinguishers, fire control equipment (i.e, extinguishing equipment, such as foam, inert gas, or dry chemicals), safety equipment, spill control and decontamination equipment? **Ch 17, 003.03 → 265.32(c)** ☒ Yes ☐ No ☐ NA ☐ NOV
  - Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers or water spray systems? **Ch 17, 003.04 → 265.32(d)** ☒ Yes ☐ No ☐ NA ☐ NOV
- Are communication and alarm systems and emergency equipment inspected and tested annually? **Ch 17, 004 → 265.33** ☒ Yes ☐ No ☐ NA ☐ NOV
- Do employees have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, whenever hazardous waste is handled? **Ch 17, 005.01 → 265.34(a)** ☒ Yes ☐ No ☐ NA ☐ NOV
- If there is only one employee on the premises do they have immediate access to a device (i.e., phone or hand held two-way radio) capable of summoning external emergency assistance? **Ch 17, 005.02 → 265.34(b)** ☒ Yes ☐ No ☐ NA ☐ NOV
- Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment? **Ch 17, 006 → 265.35** ☒ Yes ☐ No ☐ NA ☐ NOV

COMMENT DURING EXIT BRIEFING
<180 DAY AREA

- Has the facility made an attempt to make:
  - Arrangements to familiarize police, fire departments and emergency response teams with the layout of the site, properties of hazardous waste handled and associated hazards, places where site personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? **Ch 17, 007.01A → 265.37(a)(1)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Agreements designating primary emergency authority to a specific police and fire department when more than one police and fire department might respond to emergencies? **Ch 17, 007.01B → 265.37(a)(2)** — ☐ Yes ☐ No ☒ NA ☐ NOV
  - Agreements with state emergency response teams, emergency response contractors and equipment suppliers? **Ch 17, 007.01C → 265.37(a)(3)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the site? **Ch 17, 007.01D → 265.37(a)(4)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Has the facility documented the refusal of local police, fire, Departments, emergency responders, and hospitals to enter into arrangements/agreements? **Ch 17, 007.02 → 265.37(b)** — ☐ Yes ☐ No ☒ NA ☐ NOV
- Is there at least one employee (emergency coordinator) either on the premises or on call at all times with the responsibility for coordinating all emergency response measures? **Ch 9, 007.08 → 262.34(d)(5)(i)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Is the following information posted next to a telephone:
  - The name and telephone numbers (office and home) of the emergency coordinator(s)? **Ch 9, 007.09A → 262.34(d)(5)(ii)(A)** — ☒ Yes ☐ No ☐ NA ☐ NOV
  - Location of fire extinguishers and spill control material, and, if present, fire alarm? **Ch 9, 007.09B → 262.34(d)(5)(ii)(B)** — ☐ Yes ☒ No ☐ NA ☒ NOV
  - The telephone number of the fire department (unless the facility has a direct alarm)? **Ch 9, 007.09C → 262.34(d)(5)(ii)(C)** — ☒ Yes ☐ No ☐ NA ☐ NOV
- Are all employees thoroughly familiar with proper waste handling and emergency procedures? **Ch 9, 007.10 → 262.34(d)(5)(iii)** — ? ☐ Yes ☐ No ☐ NA ☒ NOV
- Have there been any emergencies that have arisen (fire, spill or explosion or release)? **Ch 9, 007.11 → 262.34(d)(5)(iv)** — ☐ Yes ☒ No ☐ NA ☐ NOV
- If yes, did the generator immediately notify the National Response Center? **Ch 9, 007.11C → 262.34(d)(5)(iv)(C)** — ☐ Yes ☐ No ☒ NA ☐ NOV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	NOX-CRETE MANUFACTURING, INC.
Facility Address	1444 SOUTH 20TH STREET OMAHA, NE 68108
Inspector (print)	TIMOTHY R. EVANS
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	Date 10.12.17

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date
David MacFarlane	David MacFarlane 10-12-17

Information for which confidential treatment is requested:

SDS for Flint Hills Process Oils
SDS For Calumet Hydrocal 200
All Photo's

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name	NOX-CRETE MANUFACTURING, INC. 1444 SOUTH 20TH STREET OMAHA, NE 68108
Facility Address	

Documents Collected? YES X (list below) NO ____

Samples Collected? YES ____ (list below) NO X Split Samples: YES ____ NO ____

Documents/ Samples were: 1) Received no charge ____ 2) Borrowed ____ 3) Purchased____

Amount Paid: $____ Method: Cash ____ Voucher ____ To Be Billed ____

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

HAZARDOUS WASTE GENERATOR TRAINING SIGN-IN SHEET (3 PAGES)
HW DRUM TRACKING SHEETS (3 PAGES)
LETTERS TO AND FROM NDEQ REGARDING EPISODIC EVENT (2 PAGES)
FACILITY LAYOUT AND KEY (2 PAGES)
7 SAFETY DATA SHEETS (54 PAGES)

Facility Representative (print)	Signature/Date
Michael Cronin	Michael Cronin 10/12/17
Inspector (print)	Signature/Date
TIMOTHY R. EVANS	Timothy R. Evans 10.11-12.17
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219	

(Rev: 7/14/14)

White Original / EPA · Yellow / Facility

ATTACHMENT 4 Page 1 of 1

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: NOX-CRETE MANUFACTURING, INC.
Address: 1444 SOUTH 20TH STREET
OMAHA, NE 68108
EPA ID Number: NED007284128 Date: 10-11-12-17

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
1. CH.4,002 → 40 CFR 262.11	WASTE DETERMINATION NOT MADE FOR THE FOLLOWING WASTE STREAMS;
	a. SOLVENT-CONTAMINATED PAPER TOWELS AND CLOTH RAGS IN LAB / ROOM 2
	b. " IN EP ROOM / ROOMS 5T AND 5
	c. " IN CONCRETE LAB / ROOM 9
	d. ONE RUSTY METAL 5-GAL., WITH 1-GAL. WHITE PLASTIC CONTAINER INSIDE, CONTAINING ~ ½ GAL. WHITE CRYSTALS AND OTHER DEBRIS IN ROOM 7
	e. ONE METAL 5-GAL. OPEN BUCKET CONTAINING ~ 1 GAL. OF UNKNOWN BROWN SOLIDS IN ROOM 7
	f. ONE WHITE PLASTIC 5-GAL. OPEN BUCKET CONTAINING ~ 1.5 GAL. OF RED LIQUID AND SOLIDS IN ROOM 7
* CORRECTED DURING INSPECTION	

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
300 MINNESOTA AVENUE
KANSAS CITY, KANSAS
66101
ATTN. TIMOTHY R. EVANS

If you have any questions about this Notice or wish to discuss your response, you may call me at (913) 551-7663, or JIM AYCOCK (Compliance Officer) at (913) 551-7887.

This Notice prepared by Timothy R. Evans Date: 10-12-17

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Michael Crowell Date: 10-12-17
Signature: Mike Crowell
Title: Plant Mgr.

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: NOX-CRETE MANUFACTURING, INC.
Address: _____

EPA ID Number: _____ Date: _____

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
	g. ONE WHITE PLASTIC 5-GAL. OPEN BUCKET CONTAINING ~5 lbs. OF UNKNOWN BROWN SOLIDS AND NITRILE GLOVES IN ROOM 7
	h. ONE METAL 1-QUART CONTAINER WITH ~6 oz. LIQUID IN EP ROOM TRASH; LABEL ON CONTAINER WAS CURE AND SEAL 1315A
2. CH9, 007.03D → 40 CFR 262.34(a)(2)	DATE OF ACCUMULATION NOT CLEARLY MARKED ON THE FOLLOWING TWO CONTAINERS: a. ONE 55-GAL. DRUM OF SILCOSEAL
	b. " " MIXED SOLVENTS
3. CH9, 007.03D → 40CFR 262.34(a)(3)	CONTAINER NOT MARKED WITH WORDS "HAZARDOUS WASTE"
	ONE WHITE PLASTIC 5-GAL. BUCKET CONTAINING

* CORRECTED DURING INSPECTION ~2.5 GALS. OF SILCOSEAL IN EP ROOM

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
_____
_____
_____
ATTN. _____

If you have any questions about this Notice or wish to discuss your response, you may call me at _____, or _____ (Compliance Officer) at _____.

This Notice prepared by TRE Date: 10.12.17

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: MD Date: 10-12-17
Signature: _____
Title: _____

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: NOX-CRETE MANUFACTURING, INC
Address: _____

EPA ID Number: _____ Date: _____

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
4. CH9, 007.09B → 40 CFR 262.34(d)(5)(ii)(B)	LOCATION OF SPILL CONTROL MATERIAL NOT POSTED NEXT TO TELEPHONE
5. CH9, 007.10 → 40 CFR 262.34(d)(5)(iii)	EMPLOYEES NOT FAMILIAR WITH PROPER WASTE HANDLING

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
_____
_____
_____
ATTN. _____

If you have any questions about this Notice or wish to discuss your response, you may call me at _____, or _____ (Compliance Officer) at _____.

This Notice prepared by TRE Date: 10.12.17

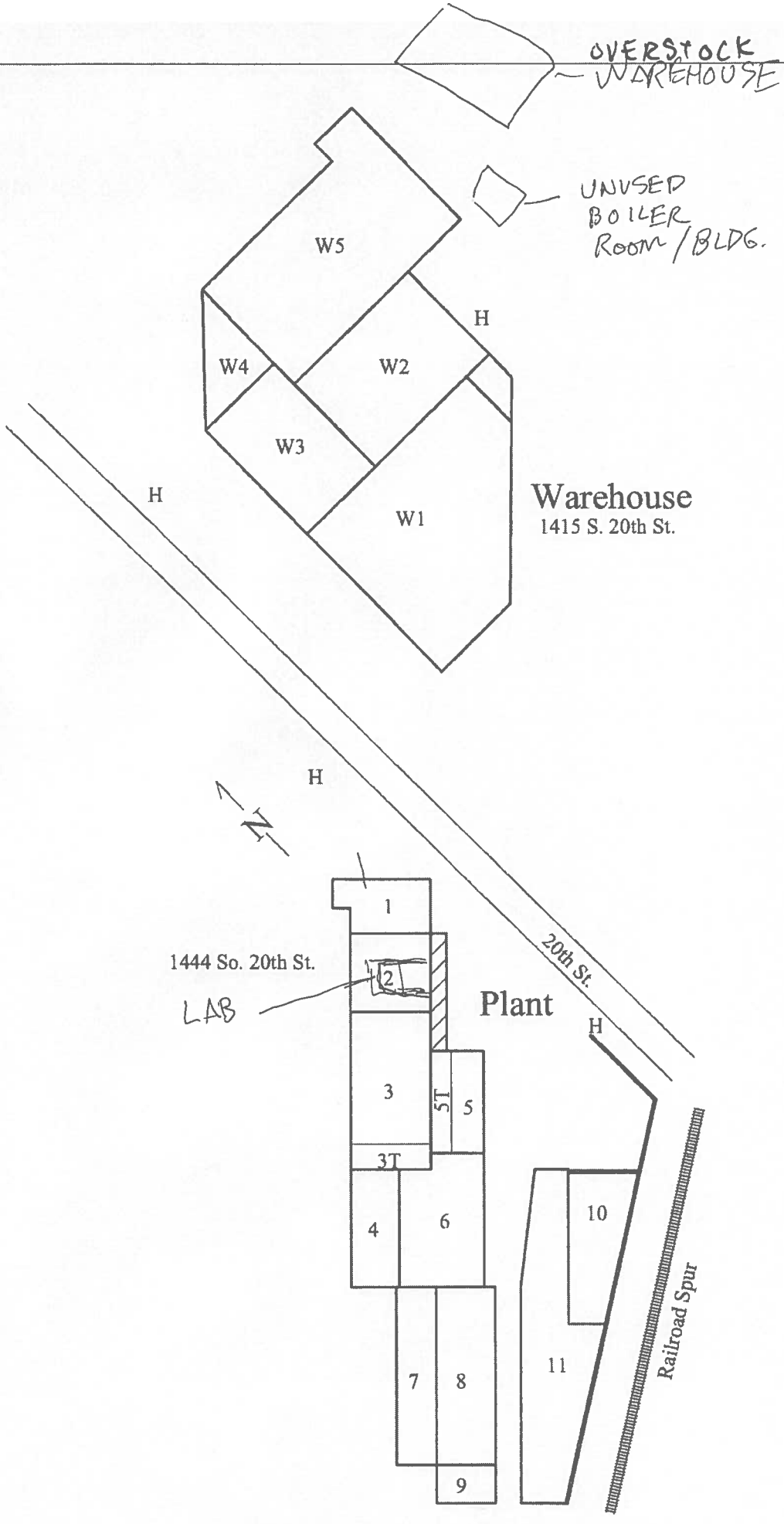
The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: MJC Date: 10/12/17
Signature: _____
Title: _____

Google Maps 1444 S 20th St

Imagery ©2017 DigitalGlobe, U.S. Geological Survey, Map data ©2017 Google 100 ft

ATTACHMENT 6A Page 1 of 1


OVERSTOCK WAREHOUSE
UNUSED BOILER ROOM / BLDG.
W5
H
W4
W2
W3
W1
H
Warehouse
1415 S. 20th St.
H
N
1
1444 So. 20th St.
2
LAB
Plant
20th St.
H
3
5T
5
3T
4
6
10
11
7
8
9
Railroad Spur

ROOM	ROOM DESCRIPTION	EST. AGE	SQ FOOT MAIN FLOOR	SQ FOOT SECOND FLOOR	USE
H	FIRE HYDRANT				
1	OFFICE	1928	2300		OFFICE
2	OFFICE	1928	4100		OFFICE
2	UPSTAIRS	1940		4100	OFFICE STORAGE HVAC/ELECTRICAL
3	OIL FILL AREA	1928	5200		MANUFACTURING / PRODUCT STORAGE & STAGING
3	DRUM STORAGE	1979		4900	EMPTY CONTAINER STORAGE AREA
3T	OIL FILL ROOM TANKS	1979		700	INSIDE OIL STORAGE TANKS
4	INSIDE STORAGE TANKS	1928	2900		INSIDE OIL STORAGE TANKS
5	EP ROOM	1940	2200		MANUFACTURING / RAW MATERIAL STORAGE
5T	EP ROOM TANKS	1979		1000	INSIDE STORAGE TANKS
6	BOILER ROOM / WATER ROOM	1940	1300		MANUFACTURING / RAW MATERIAL STORAGE
7	RAW MATERIAL WAREHOUSE	1985	3100		RAW MATERIAL STORAGE
8	RAW MATERIAL WAREHOUSE	1940	4700		RAW MATERIAL STORAGE / (FINISHED PRODUCT SAMPLE STORAGE)
9	CONCRETE LAB	1940	1400		CONCRETE TESTING LAB
10	OUTSIDE TANK BAY	2005	3200		OUTSIDE OIL STORAGE TANKS
11	ANNEX	1940	7300		EMPTY CONTAINER STORAGE / POWDER RAW MATERIALS
W1	SOUTH ROOM	1940	13200		FINISHED PRODUCT STORAGE (OIL BASE)
W2	WARM ROOM	1940	5400		FINISHED PRODUCT STORAGE (WATER BASE)
W3	NORTH ROOM	1940	7200		FINISHED PRODUCT STORAGE (SOLVENT BASE)
W4	TRIANGLE ROOM	1940	2000		RAW MATERIAL STORAGE (NON HAZARDOUS)
W5	BACK ROOM	1900	12000		EMPTY CONTAINERS / CEMENTICIOUS BAGGED PRODUCTS
W5	UPSTAIRS	1900		12000	EMPTY

Hazardous Waste Site Info Verification Report for Inspector

September 25, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to Elizabeth Koesterer, AWMD/WEMM.

Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

If a Kansas, Missouri or Nebraska facility wants to change their information, they must fill out a RCRA Subtitle C Site Identification Form (or equivalent State form) and mail it to the appropriate Sate.

EPA RCRA ID Number:	**NED007284128**
Name of Company/Site:	**NOX-CRETE MANUFACTURING INC**
Location of Site:	1444 SOUTH 20TH STREET OMAHA, NE 68108 DOUGLAS County
Land Type:	Private
NAICS:	325998 - ALL OTHER MISCELLANEOUS CHEMICAL PRODUCT AND PREPA
Mailing Address:	1444 SOUTH 20TH STREET OMAHA, NE 68108
Site Contact:	DAVID M MACFARLANE
Job Title:	LAB MANAGER
Address:	1444 SOUTH 20TH STREET OMAHA, NE 68108
Email:	DAVE@NOX-CRETE.COM
Phone Number:	402-341-2080
Current Owner of Site:	NOX-CRETE PROPERTIES INC
Phone Number:	402-341-2080
Owner Type:	Private
Current Operator of Site:	NOX-CRETE PROPERTIES INC
Operator Type:	Private
TYPE(S) OF REGULATED ACTIVITY:	Federal Small Quantity Generator State Same as Federal

Date of Site Visit: 10-11-12-17
Name of Inspector (Please print): TIMOTHY R. EVANS
(Check one): [X] EPA R7 ENST [ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator
Signature of Inspector/Investigator: Timothy R. Evans

Hazardous Waste Site Info Verification Report for Inspector

September 25, 2017

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits:
Present the Facility representative with a copy of their Site Info Verification Report (Iowa facilities only).

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Our instructions to them are printed on their Site Info Verification Report, and should be self explanatory. If the Iowa facility wants to revise their Site Info Verification Report, they can do so and mail it back to EPA R7, or have the inspector deliver it.

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Hazardous Wastes Handled: D001 D002 F003 F005

I 01/27/11 2 1st N 12/20/96 N 01/27/17 1

Certified by Notification on 01/27/17 by
DAVID MACFARLANE 01/25/17
ENV CONTACT

Date of Site Visit: 10-11-12-17

Name of Inspector (Please print): TIMOTHY R. EVANS

(Check one): [X] EPA R7 ENST [ ] EPA R7 Contractor [ ] NOWCC/SEE Investigator

Signature of Inspector/Investigator: Timothy R. Evans

A B C D E F G

Nox - Crete, Inc. - 1444 S. 20 St. Omaha, NE 68108

2,204 lbs.

Hazardous Waste Drum
Tracking Sheet

Disposal Date Aug - Oct 2014

Drum #	Label Date	Drum Weight	% Solids	Fill Location	Profile #	Comments
1	08/08/14	471	0%	E.P.	91020019-1FA221	Tank Wash
2	08/08/14	414	0%	E.P.	91020019-1FA221	Tank Wash
3	08/16/14	337	0%	E.P.	91020019-1FA221	Tank Wask
4	08/22/14	381	0%	E.P.	91020019-1FA221	Tank Wask
5	08/30/14	408	0%	E.P.	91020019-1FA221	Tank Wash
6	09/02/14	407	0%	E.P.	91020019-1FA221	Tank Wash
7	09/10/14	443	0%	E.P.	91020019-1FA221	Tank Wash
8	09/16/14	447	20%	E.P.	91020019-1FA225	Tank Wash
9	09/22/14	420	0%	E.P.	91020019-1FA221	Tank Wash
10	09/30/14	487	50%	E.P.	91020019-1FA221	Tank Wash
11	10/05/14	350	0%	E.P.	91020019-1FA221	Tank Wash
12	10/11/14	425	0%	E.P.	91020019-1FA221	Tank Wash
13	10/18/14	432	0%	E.P.	2004050142-1HF803	Paint Related Material
14	10/25/14	438	10%	E.P.	2004050142-1HF803	Paint Related Material
15	10/31/14	222	70%	E.P.	2004050142-1HF803	Paint Related Material
	Total LBS	6082				

ATTACHMENT 8 Page 1 of 3

MONTHS		NOX-CRETE	HAZ-WASTE			
DATE	12/19/2016					
DRUM #	LABEL DATE	WEIGHT(lbs.)	% SOLIDS	FILL LOCATION	S-K PROFILE # :	COMMENTS
1	10/22/2016	214	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
2	10/25/2016	670	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
3	10/28/2016	631	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
4	11/3/2016	647	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
5	11/6/2016	633	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
6	11/12/2016	661	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
7	11/19/2016	635	10%	WATER ROOM	2007120185	Parking Bumper Ad. Comp A
8	12/2/2016	667	10%	WATER ROOM	2077120185	Parking Bumper Ad. Comp A
9	12/4/2016	275	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
10	12/19/2016	436	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
11	12/19/2016	326	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
12	12/19/2016	363	0%	E.P. ROOM	91020019	CLEANUP SOLVENTS
13	12/19/2016	420	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
14	12/19/2016	419	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
15	12/19/2016	426	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
16	12/19/2016	397	10%	E.P. ROOM	91020019	CLEANUP SOLVENTS
17	12/19/2016	357	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
18	12/19/2016	399	10%	E.P. ROOM	91020019	CLEANUP SOLVENTS
19	12/19/2016	362	0%	E.P. ROOM	91020019	CLEANUP SOLVENTS
20	12/19/2016	164	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
21	12/19/2016	388	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
22	12/19/2016	422	0%	E.P. ROOM	91020019	CLEANUP SOLVENTS
23	12/19/2016	452	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
24	12/19/2016	285	0%	E.P. ROOM	91020019	CLEANUP SOLVENTS
25	12/19/2016	258	0%	E.P. ROOM	91020019	CLEANUP SOLVENTS
26	12/19/2016	294	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
27	12/19/2016	228	5%	E.P. ROOM	91020019	CLEANUP SOLVENTS
28	12/19/2016	215	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide Solution
29	12/19/2016	216	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide solution
30	12/19/2016	214	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide Solution
31	12/19/2016	209	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide Solution
32	12/19/2016	140	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide Solution
33	12/19/2016	119	95%	E.P. ROOM	2016100078-AEA103	Ammonium Hydroxide Solution
Total Haz-Waste		12492				

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3,358

		OX-CRETE	HAZ-WASTE			
		EIGHT(lbs.)	% SOLIDS	FILL LOCATION	S-K PROFILE # :	COMMENTS
		389	5%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
2	9/25/2017	390	0%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
3	9/25/2017	386	0%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
4	9/25/2017	275	0%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
5	9/25/2017	208	0%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
6	9/25/2017	402	0%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
7	9/25/2017	398	5%	E.P. ROOM	2007100190-11A221	MIXED SOLVENTS
8	9/30/2017	422	15%	E.P. ROOM	2004050142-1HF803	Waste Paint Related
9	9/27/2017	163	5%	E.P. ROOM	2007110206-1HF803	Silcoseal waste
10	9/25/2017	358	20%	E.P. ROOM	2007110206-1HF803	Silcoseal waste
11	9/26/2017	356	10%	E.P. ROOM	2007110206-1HF803	Silcoseal waste
12	8/26/2017	396	5%	EP Room	2007100190-11A221	MIXED SOLVENTS
13	8/15/2017	365	5%	EP Room	2007100190-11A221	MIXED SOLVENTS
14	8/5/2017	380	5%	EP Room	2007100190-11A221	MIXED SOLVENTS

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1-18-2017

Terri Swarts
Nebraska DEQ
1200 N Street
Suite 400
Lincoln, Ne 68509

As required in accordance with Title 128 Chapter 4, 003.02. I am notifying you that we generated and disposed of over 1,000 kilograms of hazardous waste during the month of December 2016. The time period for which we were at large generator status was only for December 2016 (12-19-16 through 12-23-16).
This was for disposal of obsolete material and we do not anticipate generating over 1,000 kilograms per month again in the foreseeable future.

We are currently at Small Quantity Generator status and have been for all of January, 2017.

If you have any questions please call.

Sincerely,

David MacFarlane
Nox-Crete Manufacturing
1444 S. 20th St. / P.O. Box 8102
Omaha, NE 68108
Ph: (402) 341-2080
Fax: (402) 341-9752
dave@nox-crete.com

NEBRASKA

Good Life. Great Environment.

DEPT. OF ENVIRONMENTAL QUALITY

Pete Ricketts, Governor

February 1, 2017

David MacFarlane
Nox-Crete Manufacturing
P.O. Box 8102
Omaha, NE 68108

Regarding: Nox-Crete Manufacturing
Facility ID: RCR 10550
Program ID: NED007284128

Dear Mr. MacFarlane:

This letter is written to acknowledge that you filed two RCRA Subtitle C Site Identification 8700-12 Forms on January 27, 2017 with the Nebraska Department of Environmental Quality (NDEQ). You changed your generator status to Large Quantity Generator, Short Term and then back to Small Quantity Generator after the waste was removed. Thank you for the manifests showing removal of waste. We have updated the above in the State's and EPA's RCRAInfo databases.

In the future if any information on the notification form changes, including any change in volume of waste generation as identified in Title 128 – Nebraska Hazardous Waste Regulations, Chapter 8, conditionally exempt small quantity generator (less than 220 lbs/month), Chapter 9, small quantity generator (220-2200 lbs./month), or Chapter 10, large quantity generator (greater than 2,200 lbs./month) you will need to re-notify this department. Changes in hazardous waste codes are not subject to the notification requirement (Title 128, Chapter 4, 003.02).

Facilities that generate, transport, treat, store or dispose of hazardous waste are subject to regulation under Title 128. State Statute §81-1511 of the Nebraska Environmental Protection Act authorizes department representatives to conduct unannounced facility inspections during normal business hours, to determine compliance with these regulations.

If you have any questions regarding this letter please contact me at (402) 471-4210.

Sincerely,

Candi Bazata

Candi Bazata
Administrative Assistant
Land Management Division

Jim Macy, Director
Department of Environmental Quality
P.O. Box 98922
1200 N Street, Suite 400
Lincoln, Nebraska 68509-8922
OFFICE 402-471-2186 FAX 402-471-2909
ndeq.moreinfo@nebraska.gov
deq.ne.gov

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WASTE STREAM TABLE

(List all hazardous wastes first, followed by solid wastes.)

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
Solvent-Contaminated Paper Wipes and Cloth Rags - QC Lab/Room 2 (Mineral Spirits, Butanol, Xylene, Ethyl Acetate, Isopropyl Alcohol, Aromatic 100, VMP Naptha, Hexane, Methanol, Surface Cleaner)	ND	Routine (R)	ND	ND	2	Lb.	None	NA	Allowed to Dry/Evaporate on side of trash cans and in SAA Container Funnel; Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Solvent-Contaminated Cloth Rags – Drum Storage/Room 3 and EP Rooms/Rooms 5T and 5 (Mineral Spirits, Butanol, Xylene, Ethyl Acetate, Isopropyl Alcohol, Aromatic 100, VMP Naptha, Hexane, Methanol)	ND	R	ND	ND	50	Lbs.	None	NA	Allowed to Dry/Evaporate; Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Solvent-Contaminated Cloth Rags – Concrete Lab (Mineral Spirits)	ND	R	ND	ND	6-10	Rags	None	NA	Allowed to Dry/Evaporate; Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	

ATTACHMENT 16 Page 1 of 6

WASTE STREAM TABLE

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
White Crystals and Other Debris	ND	ND	ND	ND	ND	ND	~½ Gallon	Unknown	Not Disposed Yet	
Unknown Brown Solids	ND	ND	ND	ND	ND	ND	~1 Gallon	Unknown	Not Disposed Yet	
Unknown Red Liquid and Solids	ND	ND	ND	ND	ND	ND	~1.5 Gallons	Unknown	Not Disposed Yet	
Unknown Brown Solids and Nitrile Gloves	ND	ND	ND	ND	ND	ND	~5 Lbs.	Unknown	Not Disposed Yet	
1-Quart Metal Can in Trash Containing Unknown Liquid	ND	ND	ND	ND	ND	ND	~6 oz.	Unknown	Not Disposed Yet	
Mixed Solvents	HW	R	D001, F003	PK	~100	Gal.	5, 55-Gal. Drums	8/5/17	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Spent Laboratory Solvents - Mineral Spirits, Butanol, Xylene, Ethyl Acetate, Isopropyl Alcohol, Aromatic 100, VMP Naptha, Hexane	HW	R	D001, F003	PK	1/2	Gal.	1, Partially-Full 5-Gallon Bucket	NA; SAA Containers	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Spent Laboratory Solvents – Methanol and Clear PreForm	HW	R	D001, F003	PK	1	Quart	1, Partially-Full 5-Gallon Bucket	NA; SAA Containers	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	

ATTACHMENT 10 Page 2 of 6

WASTE STREAM TABLE

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
Spent Laboratory Solvents – 50% Isopropyl Alcohol and 50% Soft Water	HW	R	D001	PK	1	Gal.	1, Partially-Full 5-Gallon Bucket	NA; SAA Containers	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Waste Paint Related Material	HW	R	D001	PK	40	Gal.	1, 55-Gallon Drum	9/30/17	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Off-Specification Product, e.g. Silcoseal 2F Concentration	HW	Not Routine (NR)	D001, D002, F003	PK	3	Drums	13, 55-Gallon Drums	8/5/17	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Off-Specification Product	SW	Not Routine (NR)	NA	PK	150	Gal.	3, 275-Gal Totes	5/1/17	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Tank Cleaning Wastewater – Bleach and Water	SW	R	NA	PK	100	Gal.	None	NA	Sewer; City of Omaha POTW	

ATTACHMENT 10 Page 3 of 6

WASTE STREAM TABLE

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
Tyvek Suits	SW	R	NA	PK	8	Suits	None	NA	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Nitrile Gloves - QC Lab	SW	R	NA	PK	800	Gloves	None	NA	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
4 Ft. Waste Lamps	UW	R	NA	PK	5	Lamps	None	NA	Mailed to Waste Management; Recycled through the WM LampTracker Program in Wilmington, SC	
8 Ft. Waste Lamps	UW	R	NA	PK	1	Lamps	None	NA	Mailed to Waste Management; Recycled through the WM LampTracker Program in Wilmington, SC	
Lead Acid Batteries - Forklift	EX	NR	NA	PK	1 Every 3-4 yrs.	Battery	None	NA	Service Provided by Clarklift in Omaha, NE; Recycled Through Husker Battery	
Used Oil – Forklifts	UO	NR	NA	PK	1.5 Every 6 Mo.	Gal.	None	NA	Service Provided by Clarklift in Omaha, NE; Recycled Through Product Recovery & Recycling, Inc., Fort Calhoun, NE	

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WASTE STREAM TABLE

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
Used Oil Filters - Forklifts	SW	NR	NA	PK	1 Every 6 Mo.	Filter	None	NA	Service Provided by Clarklift in Omaha, NE; Recycled Through Product Recovery & Recycling, Inc., Fort Calhoun, NE	
Spent Oil-Based Products – Shipping Warehouse (Hydrocal 200, Process Oils, Etc. and Cutting Oil)	SW	R	NA	PK	Information Not Available at Time of Report Submission	Information Not Available at Time of Report Submission	1, ¾-Full 55-Gallon Drum	Information Not Available at Time of Report Submission	Transported by Barton Solvents and Coal City Cob; WRR Environmental Services, Eau Claire Wisconsin; Fuel Blended	
Oil-Contaminated Metal Shavings – Shipping Warehouse	SW	NR	NA	PK	1	Qt.	~3 Qts.	4/1/17	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Cardboard	SW	R	NA	PK	200	Lbs.	50	NA	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Plastic/Polyethylene Wrap	SW	R	NA	PK	50	Lbs.	10 Lbs.	NA	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	

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WASTE STREAM TABLE

Waste Description or Process	Waste Type	Generation Freq.	If HW, list all codes	Waste Det. Method	Waste Amount Generated Per Month		Waste Amount Presently in Storage	Oldest Accumulation Start Date	Present Waste Disposal Location (list name of destination facility and if not clear, put type of facility (MSWLF, TSDF, WWTF, etc.)	Att. #
					Amount	Units				
Floor Sweepings	SW	R	NA	PK	50	Lbs.	None	NA	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	
Pallets	SW	R	NA	PK	20-25	Pallets	None	NA	Picked Up by Blair's Pallet Company, Omaha, NE	
Office and General Trash	SW	R	NA	PK	100	Lbs.	50 Lbs.	Picked Up When Necessary; Once Each Week	Disposed in General Trash; Hauled by Waste Management; Disposed at Douglas County/Pheasant Point Landfill, Elk City, NE	

Waste Types
HW = Hazardous Waste
SW = Solid Waste
UW = Universal Waste
UO = Used Oil
EX = Exempt (e.g. recycled metal)
ND = Not Determined

Generation Frequency
R = Routine
NR = Non-routine, episodic, occasional
OT = One-time

Waste Determination Methods:
PK = Process Knowledge
AD = Analytical Data
ND = Not Determined

Last Column: Attachment # if attaching documents pertinent to this waste stream

ATTACHMENT 10 Page 6 of 6

nox-crete
chemical solutions to concrete problems

CURE AND SEAL 1315 A Safety Data Sheet

According to Regulation 29 CFR 1910.1200
Regulation (EC) No. 1272/2008 (CLP)(GHS)

Section 1. Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier

Product Form	Mixture
Trade Name	CURE AND SEAL 1315 A
Product Code	CS1315A

1.2 Relevant identified uses of the substance or mixture and uses advised against

Use	Industrial. For professional use only.

1.2.2 Uses Advised Against

No additional information available

1.3 Details of the supplier of the safety data sheet

Manufacturer

NOX-CRETE MANUFACTURING INC
1444 SOUTH 20TH STREET
OMAHA, NE 68108
Tel: 402-341-2080
Fax: 402-341-9752
E-Mail: corporate@nox-crete.com
Web Site: www.nox-crete.com

1.4 Emergency telephone number

Emergency Number	Chemtrec (800) 424-9300 Chemtrec Outside of U.S. 703-527-3887

Section 2. Hazards identification

2.1 Classification of the substance or mixture

Classification according to Regulations 29CFR 1910.1200 , (EC) No. 1272/2008(CLP)(GHS)

Flam Liq. 3	H226
Asp. Tox. 1	H304
Acute Tox. 4 (dermal)	H312
Skin Irrit. 2	H315
Eye Irrit. 2	H319
Acute Tox. 4 (inhalation)	H332
STOT SE 3 resp. irrit.	H335
STOT SE 3 drowsiness	H336
Carc. 2	H351
STOT RE 2	H373

Full text of H phrases see section 16

Adverse physiochemical, human health and environmental effects

No additional information available

2.2 Label elements

Hazard pictograms

Signal word	**Danger**
Hazard statements	H226 - Flammable liquid and vapor H304 - May be fatal if swallowed and enters airways H312 - Harmful in contact with skin H315 - Causes skin irritation H319 - Causes serious eye irritation H332 - Harmful if inhaled H335 - May cause respiratory irritation H336 - May cause drowsiness or dizziness H351- Suspected of causing cancer H373 - May cause damage to ears and cns through prolonged or repeated exposure
Precautionary statements	
Prevention:	P201- Obtain special instructions before use P202- Do not handle until all safety precautions have been read and understood P210 - Keep away from heat/sparks/open flames/hot surfaces-No smoking P233 - Keep container tightly closed P240 - Ground/bond container and receiving equipment P241 - Use explosion-proof electrical/ventilating/light/…/equipment P242 - Use only non-sparking tools P243 - Take precautionary measures against static discharge P260 - Do not breathe dust/fume/gas/mist/vapors/spray P264 - Wash exposed area's thoroughly after handling. P271 - Use only outdoors or in a well-ventilated area P280 - Wear protective gloves/protective clothing/eye protection/face protection
Response:	P301+P310 - IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician P303+P361+P353 - IF ON SKIN (or hair): Remove / Take off immediately all contaminated clothing. Rinse skin with water / shower P304+P340 - IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing. P305+P351+P338 -IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do so - continue rinsing P308+P313 - IF exposed or concerned: Get medical advice/attention P331 - Do NOT induce vomiting P337+P313 - If eye irritation persists: Get medical advice/attention P370+P378 - In case of fire: Use Dry chemical, foam, carbon dioxide for extinction
Storage:	P403+P405+P235+P233 - Store locked up in a cool well ventilated place. Keep container tightly closed.
Disposal:	P501 - Dispose of contents/container in accordance with local/regional/national/international regulations

2.3 Other hazards

Full text of R, H and EUH phrases: see section 16

ATTACHMENT W PAGE 2 OF 8

Section 3. Composition / information on ingredients

3.1 Substances

Not applicable

3.2 Mixture

Name	Product identifier	%
Xylene	1330-20-7	< 25.0
Hydrotreated Light Distillate	Trade Secret	Trade Secret
Ethylbenzene	100-41-4	< 12.0
1,2,4-Trimethylbenzene	95-63-6	< 2.5
Cumene	98-82-8	<1.0

Pursuant to 29CFR 1910.1200(i) the specific chemical identity (and / or) concentration is being withheld as Trade Secret, while all health and safety properties and effects are included in the SDS.

Section 4. First aid measures

4.1 Description of first aid measures

First-aid measures general Get medical advice/attention if you feel unwell. Never give anything by mouth to an unconscious person.

First-aid measures after inhalation If the individual experiences nausea, dizziness, has difficulty In breathing seek a healthcare professional immediately. In all cases of doubt, or when symptoms persist, seek medical advice. Remove to fresh air and keep at rest in a position comfortable for breathing. Immediately call a Poison Center or doctor/physician.

First-aid measures after skin contact If skin irritation persists, seek medical attention. Remove or take off immediately all contaminated clothing. Rinse skin with water or shower. Wash off immediately with soap and plenty of water.

First-aid measure after eye contact When contact lenses are worn, remove if possible. In case of contact with eyes, rinse immediately with plenty of flowing water for 10 to 15 minutes while holding eyelids apart. Get medical attention immediately.

First-aid measures after ingestion Rinse mouth. DO NOT induce vomiting. Get medical attention immediately.

4.2 Most important symptoms and effects, acute and delayed

Symptoms/injuries after inhalation May cause irritation to the respiratory tract. Overexposure to vapors may result in headache, nausea, drowsiness or dizziness.

Symptoms/injuries after skin contact May cause skin irritation or burning sensation

Symptoms/injuries after eye contact May cause eye irritation or injury

Symptoms/injuries after ingestion May cause severe irritation or burns to the mucous membrane of the mouth, throat, esophagus and stomach

4.3 Indication of any immediate medical attention and special treatment needed

No additional information available

Section 5. Firefighting measures

5.1 Extinguishing media

Suitable extinguishing media Dry chemical, foam, carbon dioxide

Unsuitable extinguishing media Do not use heavy water stream

5.2 Special hazards arising from the substance or mixture

Reactivity Thermal decomposition products may cause a health hazard.

5.3 Advice for firefighters

Firefighting instructions Flammable Liquid! This material releases vapors when heated above ambient temperatures. Vapors can cause a flash fire. Use water spray or fog to cool exposed containers.

Protective equipment for firefighters Firefighters should always wear self-contained breathing apparatus (SCBA) and full protective gear when fighting any chemical fire.

Other information On heating or burning harmful gasses/vapors may be released. This product may cause the floor to become slippery.

Section 6. Accidental release measures

6.1 Personal precautions, protective equipment and emergency procedures

General measures Extremely Flammable. Eliminate any ignition sources. Dike or impound spilled material. Use Non-sparking tools. All equipment must be grounded. Take proper precautions to ensure your own health and safety before attempting spill control or cleanup.

6.11 Protective Equipment Equip cleanup crew with proper protective equipment.

6.2 Environmental precautions Prevent entry to sewers and public waters. Notify authorities if liquid enters sewers or public waters.

6.3 Methods and materials for containment and cleaning up

Methods for cleaning up Soak up spills with inert solids, such as clay or diatomaceous earth. Collect into vapor tight containers and dispose of properly.

Section 7. Handling and storage

7.1 Precautions for safe handling

Protective measures Wash hands and other exposed areas with soap and water before eating, drinking or smoking and when leaving work. Provide good ventilation in work areas to prevent formation of vapor. When not in use keep containers tightly closed. Avoid breathing vapor or mist.

Hygiene measures Wash contaminated clothing before reuse.

7.2 Conditions for safe storage, including any incompatibilities

Storage conditions Store in accordance with local regulations. Store in original container in a cool well ventilated place away from heat, sparks and open flame.. Keep containers tightly closed until ready for use.

Incompatible materials Strong oxidizing agents

Storage temperature Store in a cool dry environment away from sources of ignition.

Section 8. Exposure controls/personal protection

8.1 Control parameters

Occupational exposure limits

Ingredient name	Occupational exposure limits ACGIH TLV (United States)
Xylene	TWA: 100 ppm 8 hours
Hydrotreated Light Distillate	TWA: 100 ppm 8 hours
Ethylbenzene	TWA: 100 ppm 8 hours
1,2,4-Trimethylbenzene	TWA: 25 ppm 8 hours
Cumene	TWA: 50 ppm 8 hours

8.2 Exposure controls

Appropriate engineering controls	Use with adequate ventilation to keep product vapor concentrations below specified TLV
Eye and face protection	Chemical goggles and/or face shields are required to prevent potential eye contact, irritation or injury.
Skin protection	Wear chemical resistant gloves and appropriate protective clothing and boots as required to prevent skin contact. Wash exposed skin frequently with soap and water. Soiled clothing should be laundered before reuse.
Respiratory protection	General room ventilation is normally adequate. Avoid breathing the product mist or vapors. The use of an appropriate respirator is recommended whenever the airborne concentrations exceed the TLV.

Section 9. Physical and chemical properties

9.1 Information on basic physical and chemical properties

Appearance	Clear liquid
Odor	Strong Aromatic Odor
Odor Threshold	No data available
PH	No data available
Melting point	No data available
Freezing point	No data available
Boiling point	> 280 C (>338 F)
Flash point	32 C 90 F PMCC
Relative evaporation rate (butyl acetate=1)	No data available
Flammability (solid, gas)	Flammable liquid and vapor
Upper/lower explosive limits	No data available
Vapor pressure	No data available
Vapor density	No data available
Relative density (Specific gravity)	0.86 Kg per Liter 7.2 Lbs per Gallon
Solubility	Water: Negligible
Partition coefficient n-octanol/water	No data available
Auto-ignition temperature	Not applicable
Viscosity	No data available
VOC content	Less than 700 g/l

Section 10. Stability and reactivity

10.1 Reactivity	No additional information available
10.2 Chemical stability	Stable under normal conditions
10.3 Possibility of hazardous reactions	Hazardous polymerization will not occur.
10.4 Conditions to avoid	Extreme high or low temperatures.
10.5 Incompatible materials	Strong acids and oxidizers
10.6 Hazardous decomposition products	carbon monoxide, carbon dioxide, various hydrocarbon derivatives

Section 11. Toxicology information

11.1 Information on toxicological effects

Acute toxicity		No adverse effects expected under intended use.
Irritation/Corrosion	**Skin**	May cause skin irritation
	Eyes	May causes serious eye irritation and damage.
Respiration or skin sensitization		May cause respiratory irritation
Germ cell mutagenicity		No data available

Carcinogenicity	IARC	NTP
Xylene	3	
Ethylbenzene	2B	
Cumene	2B	Reasonably Anticipated To Be Human Carcinogen

2B - Limited evidence in humans and less than sufficient evidence in animals.
3 - Inadequate in humans and inadequate or limited in animals.

Reproductive toxicity No data available
Specific target organ toxicity
Single exposure No data available
Repeated exposure No data available
Aspiration hazard May be fatal if swallowed and enters airways

Section 12. Ecological information

12.1 Ecotoxicity Not established
12.2 Persistence and degradability Not established
12.3 Bioaccumulative potential Not established
12.4 Mobility in soil No additional information available
12.5 Other adverse effects Avoid release to the environment

SECTION 13. Disposal Considerations

13.1 Waste treatment methods The user of this material has the responsibility to dispose of unused material, residues and containers in compliance with all applicable local, state and federal laws and regulations regarding treatment, storage and disposal for hazardous and nonhazardous wastes.

SECTION 14. Transport information

In accordance with ADR / RID / ADNR / IMDG / ICAO / IATA
14.1 UN number UN1263
14.2 UN proper shipping name Paint Related Material UN1263
14.3 Transport hazard class(es) Flammable Liquid
14.4 Packing group II
14.5 Environmental hazards No additional information available
14.6 Special precautions for user
14.7 Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code No additional information available
14.8 Transport in bulk according to CFR 49 173.15 Not applicable

SECTION 15. Regulatory information

15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture
15.1.2 USA Regulations

ATTACHMENT 11 Page 6 of 8

Section 313 Contains the following ingredients at or above the reporting level requirements of Section 313. This information must be included in all SDS's copied or distributed for this material.

CHEMICAL	CAS #	MAX WEIGHT %
Xylene	1330-20-7	25.0
Ethylbenzene	100-41-4	12.0
1,2,4-Trimethylbenzene	95-63-6	2.5

TSCA All ingredients are listed or exempted
Proposition 65 This product contains one or more chemicals known to the State of California to cause cancer and/or reproductive toxicity.

15.1.3 Canada Regulations This SDS has been prepared according to the hazard criteria of the Controlled Products Regulations (CPR) and the SDS contains all of the information required by the CPR.
DSL All ingredients are listed or exempted
WHMIS Class B, D2-B
15.2 Chemical safety assessment A Chemical Safety Assessment has not been carried out.

Section 16. Other information

Date of issue	4-22-2015
Version	2.2
Number	802
Date of previous issue	1-19-2015
Preparer	Nox-Crete Manufacturing Inc.

Reference Documentation

The information contained herein is based on data available to us and is believed to be correct. Since this information may have been obtained in part from independent laboratories or other sources not under our direct supervision, no representation is made that the information is accurate, reliable, complete or representative and Buyer may rely thereon only at Buyers risk. We have made no effort to censor or to conceal deleterious aspects of this product. Further since we cannot anticipate or control the many different conditions under which this information or our products may be used, we make no guarantee that the health and/or safety precautions we have suggested will be adequate for all individuals and /or situations involving its handling or use. Likewise, we make no guarantee or warranty of any kind that the use or disposal of this product is in compliance with all federal, state or local laws. It is the obligation of each user of the product mentioned herein to determine and comply with the requirements of all applicable statutes.

Disclaimer

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Full text of R, H and EUH phrases

Flam Liq. 3 - Flammable liquids, hazard category 3
Asp. Tox. 1 - Aspiration hazard, hazard category 1
Acute Tox. 4 (dermal) - Acute toxicity (dermal), hazard category 4
Skin Irrit. 2 - Skin irritation, hazard category 2
Eye Irrit. 2 - Serious eye damage / eye irritation, Category 2

Acute Tox. 4 (inhalation) - Acute toxicity (inhalation), hazard category 4
STOT SE 3 - Respiratory tract irritation, hazard category 3
STOT SE 3 - Narcotic effects, hazard category 3
Car 2 - Carcinogenicity, Category 2

H226 - Flammable liquid and vapor
H304 - May be fatal if swallowed and enters airway
H312 - Harmful in contact with skin
H315 - Causes skin irritation
H319 - Causes serious eye irritation
H332 - Harmful if inhaled
H335 - May cause respiratory irritation
H336 - May cause drowsiness or dizziness
H351- Suspected of causing cancer
H373 - May cause damage to ears and CNS through prolonged or repeated exposure

P201- Obtain special instructions before use
P202- Do not handle until all safety precautions have been read and understood
P210 - Keep away from heat/sparks/open flames/hot surfaces-No smoking
P233 - Keep container tightly closed
P240 - Ground/bond container and receiving equipment
P241 - Use explosion-proof electrical/ventilating/light/…/equipment
P242 - Use only non-sparking tools
P243 - Take precautionary measures against static discharge.
P260 - Do not breathe dust/fume/gas/mist/vapors/spray
P264 - Wash exposed area's thoroughly after handling.
P271 - Use only outdoors or in a well-ventilated area
P280 - Wear protective gloves/protective clothing/eye protection/face protection
P301+P310 - IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician
P303+P361+P353 - IF ON SKIN (or hair): Remove / Take off immediately all contaminated clothing. Rinse skin with water / shower
P304+P340 - IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.
P305+P351+P338 -IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do so - continue rinsing
P308+P313 - IF exposed or concerned: Get medical advice/attention
P331 - Do NOT induce vomiting.
P337+P313 - If eye irritation persists: Get medical advice/attention
P370+P378 - In case of fire: Use Dry chemical, foam, carbon dioxide for extinction
P403+P405+P235+P233 - Store locked up in a cool well ventilated place. Keep container tightly closed.
P501 - Dispose of contents/container in accordance with local/regional/national/international regulations

nox-crete
chemical solutions to concrete problems

SILCOSEAL 2F CONC Safety Data Sheet

According to Regulation 29 CFR 1910.1200, Regulation (EC) No. 1272/2008 (CLP)(GHS), *Hazardous Products Regulation* (HPR) (WHMIS 2015)

Section 1. Identification of the substance/mixture and of the company/undertaking

1.1 Product identifier

Product Form	Mixture
Trade Name	**SILCOSEAL 2F CONC**
Product Code	~~SS~~

1.2 Relevant identified uses of the substance or mixture and uses advised against

Use	Industrial. For professional use only.

1.2.2 Uses Advised Against

No additional information available

1.3 Details of the supplier of the safety data sheet

Manufacturer

NOX-CRETE MANUFACTURING INC
1444 SOUTH 20TH STREET
OMAHA, NE 68108
Tel: 402-341-2080
Fax: 402-341-9752
E-Mail: corporate@nox-crete.com
Web Site: www.nox-crete.com

1.4 Emergency telephone number

Emergency Number	Chemtrec (800) 424-9300 Chemtrec Outside of U.S. 703-527-3887

Section 2. Hazards identification

2.1 Classification of the substance or mixture

Classification according to Regulations 29CFR 1910.1200 , (EC) No. 1272/2008(CLP)(GHS)

Flam. Liq. 3	H226
Acute Tox. 4 (oral)	H302
Asp. Tox. 1	H304
Skin Irrit. 2	H315
Eye Dam. 1	H318
Acute Tox. 4 (inhalation)	H332
STOT SE 3 (Resp. Irrit.)	H335
STOT SE 3(narcotic effects)	H336
Carc. 2	H351
STOT RE 2 (CNS)(ears)	H373

Full text of H and R phrases see section 16

Adverse physiochemical, human health and environmental effects

No additional information available

2.2 Label elements

Hazard pictograms

ATTACHMENT 12 Page 1 of 8

Signal word Danger

Hazard statements

H226: Flammable liquid and vapor
H302: Harmful if swallowed
H304: May be fatal if swallowed and enters airways
H315: Causes skin irritation
H318: Causes serious eye damage
H332: Harmful if inhaled
H335: May cause respiratory irritation
H336: May cause drowsiness or dizziness
H351: Suspected of causing cancer
H373: May cause damage to organs

Precautionary statements

Prevention:

P201: Obtain special instructions before use.
P202: Do not handle until all safety precautions have been read and understood.
P210: Keep away from heat/sparks/open flames/hot surfaces-No smoking.
P240: Ground/bond container and receiving equipment
P241: Use explosion-proof electrical/ventilating/light/equipment
P242: Use only non-sparking tools
P243: Take precautionary measures against static discharge
P261: Avoid breathing dust/fume/gas/mist/vapors/spray.
P264: Wash exposed area's thoroughly after handling.
P270: Do not eat, drink or smoke when using this product.
P271: Use only outdoors or in a well-ventilated area.
P280: Wear protective gloves/protective clothing/eye protection/face protection.

Response:

P301+P310+P330: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician. Rinse mouth.
P303+P361+P353: IF ON SKIN (or hair): Remove / Take off immediately all contaminated clothing. Rinse skin with water / shower
P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.
P305+P310: IF IN EYES: Immediately call a POISON CENTER or doctor/physician.
P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do so - continue rinsing.
P312: Call a POISON CENTER or doctor/physician if you feel unwell.
P331: Do NOT induce vomiting.
P370+P378: In case of fire: Use Dry chemical, foam, carbon dioxide for extinction.

Storage:

P403+P235+P233: Store in a cool well ventilated place. Keep container tightly closed.
P405: Store locked up.

Disposal:

P501: Dispose of contents/container in accordance with local/regional/national/international regulations.

2.3 Other hazards None known

Full text of H and EUH phrases: see section 16

Section 3. Composition / information on ingredients

3.1 Substances

Not applicable

3.2 Mixture

Classification according to Regulations 29CFR 1910.1200 , (EC) No. 1272/2008(CLP)(GHS)

Name	Product identifier	%
Butanol	71-36-3	<15.0
Petroleum Distillate	Trade Secret	Trade Secret
Solvent Naphtha	Trade Secret	Trade Secret
1,2,4-Trimethylbenzene	95-63-6	<10.0
Ethylbenzene	100-41-4	<10.0
Xylene	1330-20-7	<28.0

Pursuant to 29CFR 1910.1200(i) the specific chemical identity is being withheld as Trade Secret, while all health and safety properties and effects are included in the SDS..

Section 4. First aid measures

4.1 Description of first aid measures

First-aid measures general Get medical advice/attention if you feel unwell. Never give anything by mouth to an unconscious person.

First-aid measures after inhalation If the individual experiences nausea, dizziness, has difficulty in breathing seek a healthcare professional immediately. In all cases of doubt, or when symptoms persist, seek medical advice. Remove to fresh air and keep at rest in a position comfortable for breathing. Immediately call a Poison Center or doctor/physician.

First-aid measures after skin contact If skin irritation persists, seek medical attention. Remove or take off immediately all contaminated clothing. Rinse skin with water or shower. Wash off immediately with soap and plenty of water.

First-aid measure after eye contact When contact lenses are worn, remove if possible. In case of contact with eyes, rinse immediately with plenty of flowing water for 10 to 15 minutes while holding eyelids apart. Get medical attention immediately.

First-aid measures after ingestion Rinse mouth. DO NOT induce vomiting. Get medical attention immediately.

4.2 Most important symptoms and effects, acute and delayed

Symptoms/injuries after inhalation May cause irritation to the respiratory tract. Overexposure to vapors may result in headache, nausea, drowsiness or dizziness.

Symptoms/injuries after skin contact May cause skin irritation or burning sensation

Symptoms/injuries after eye contact May cause eye irritation or injury

Symptoms/injuries after ingestion May cause severe irritation or burns to the mucous membrane of the mouth, throat, esophagus and stomach.

4.3 Indication of any immediate medical attention and special treatment needed

No additional information available

Section 5. Firefighting measures

5.1 Extinguishing media

Suitable extinguishing media	Dry chemical, foam, carbon dioxide
Unsuitable extinguishing media	Do not use heavy water stream

5.2 Special hazards arising from the substance or mixture

Reactivity	Thermal decomposition products may cause a health hazard.

5.3 Advice for firefighters

Firefighting instructions	This material releases vapors when heated above ambient temperatures. Vapors can cause a flash fire. Use water spray or fog to cool exposed containers.
Protective equipment for firefighters	Firefighters should always wear self-contained breathing apparatus (SCBA) and full protective gear when fighting any chemical fire.
Other information	On heating or burning harmful gasses/vapors may be released. This product may cause the floor to become slippery.

Section 6. Accidental release measures

6.1 Personal precautions, protective equipment and emergency procedures

General measures	Flammable Liquid. Eliminate any ignition sources. Dike or impound spilled material. Take proper precautions to ensure your own health and safety before attempting spill control or cleanup.
6.11 Protective Equipment	Equip cleanup crew with proper protective equipment.
6.2 Environmental precautions	Prevent entry to sewers and public waters. Notify authorities if liquid enters sewers or public waters.

6.3 Methods and materials for containment and cleaning up

Methods for cleaning up	Soak up spills with inert solids, such as clay or diatomaceous earth. Collect into vapor tight containers and dispose of properly.

Section 7. Handling and storage

7.1 Precautions for safe handling

Protective measures	Wash hands and other exposed areas with soap and water before eating, drinking or smoking and when leaving work. Provide good ventilation in work areas to prevent formation of vapor. When not in use keep containers tightly closed. Avoid breathing vapor or mist.
Hygiene measures	Wash contaminated clothing before reuse.

7.2 Conditions for safe storage, including any incompatibilities

Storage conditions	Store in accordance with local regulations. Store in original container in a cool well ventilated place away from heat, sparks and open flame.. Keep containers tightly closed until ready for use.
Incompatible materials	Strong oxidizing agents. Strong acids or bases and select amines.
Storage temperature	Store in a cool dry environment away from sources of ignition.

Section 8. Exposure controls/personal protection

8.1 Control parameters

Occupational exposure limits

Ingredient name	Occupational exposure limits ACGIH TLV (United States)
Butanol	TWA: 20 ppm 8 hours
Petroleum Distillate	TWA: 400 ppm 8 hours
Solvent Naphtha	TWA: 19 ppm 8 hours

1,2,4-Trimethylbenzene	TWA: 25 ppm 8 hours
Ethylbenzene	TWA: 20 ppm 8 hours
Xylene	TWA: 100 ppm 8 hours

8.2 Exposure controls

Appropriate engineering controls Use with adequate ventilation to keep product vapor concentrations below specified TLV

Eye and face protection Chemical goggles and/or face shields are required to prevent potential eye contact, irritation or injury.

Skin protection Wear chemical resistant gloves and appropriate protective clothing and boots as required to prevent skin contact. Wash exposed skin frequently with soap and water. Soiled clothing should be laundered before reuse.

Respiratory protection General room ventilation is normally adequate. Avoid breathing the product mist or vapors. The use of an appropriate respirator is recommended whenever the airborne concentrations exceed the TLV.

Section 9. Physical and chemical properties

9.1 Information on basic physical and chemical properties

Appearance	Red liquid
Odor	Mild Solvent Odor
Odor Threshold	No data available
PH	No data available
Melting point	No data available
Freezing point	No data available
Boiling point	94 C (200 F)
Flash point	27 C 80 F PMCC
Relative evaporation rate (butyl acetate=1)	No data available
Flammability (solid, gas)	Flammable liquid and vapor
Upper/lower explosive limits	No data available
Vapor pressure	No data available
Vapor density	No data available
Relative density (Specific gravity)	0.83 Kg per Liter 6.9 Lbs per Gallon
Solubility	Water: Insoluble
Partition coefficient n-octanol/water	No data available
Auto-ignition temperature	No data available
Viscosity	No data available
VOC content	N/A

Section 10. Stability and reactivity

10.1 Reactivity	No additional information available
10.2 Chemical stability	Stable under normal conditions
10.3 Possibility of hazardous reactions	Hazardous polymerization will not occur.
10.4 Conditions to avoid	Extreme high or low temperatures.
10.5 Incompatible materials	Strong acids, bases, oxidizers and select amines.
10.6 Hazardous decomposition products	carbon monoxide, carbon dioxide, various hydrocarbon derivatives

Section 11. Toxicology information

11.1 Information on toxicological effects

Acute toxicity		No adverse effects expected under intended use.
Irritation/Corrosion	**Skin**	May cause skin irritation
	Eyes	May causes serious eye irritation and damage.
Respiration or skin sensitization		May cause respiratory irritation
Germ cell mutagenicity		No data available

Carcinogenicity **IARC**

Xylene	3
Ethylbenzene	2B

2B - Limited evidence in humans and less than sufficient evidence in animals.
3 - Inadequate in humans and inadequate or limited in animals.

Reproductive toxicity	No data available
Specific target organ toxicity	
Single exposure	No data available
Repeated exposure	No data available
Aspiration hazard	May be fatal if swallowed and enters airways

Section 12. Ecological information

12.1 Ecotoxicity	No data available
12.2 Persistence and degradability	No data available
12.3 Bioaccumulative potential	No data available
12.4 Mobility in soil	No data available
12.5 Other adverse effects	Avoid release to the environment

SECTION 13. Disposal Considerations

13.1 Waste treatment methods The user of this material has the responsibility to dispose of unused material, residues and containers in compliance with all applicable local, state and federal laws and regulations regarding treatment, storage and disposal for hazardous and nonhazardous wastes.

SECTION 14. Transport information

In accordance with ADR / RID / ADNR / IMDG / ICAO / IATA

14.1 UN number	UN1263
14.2 UN proper shipping name	Paint Related Material
14.3 Transport hazard class(es)	3
14.4 Packing group	PGIII
14.5 Environmental hazards	No additional information available
14.6 Special precautions for user	No additional information available
14.7 Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code	No additional information available

14.8 Transport in bulk according to CFR 49 173.15 Not applicable

SECTION 15. Regulatory information

15.1 Safety, health and environmental regulations/legislation specific for the substance or mixture

15.1.2 USA Regulations

Section 313 Contains the following ingredients at or above the reporting level requirements of Section 313. This information must be included in all SDS's copied or distributed for this material.

CHEMICAL	CAS #	MAX WEIGHT %
Xylene	1330-20-7	< 28.0
1,2,4-Trimethylbenzene	95-63-6	< 10.0
Ethylbenzene	100-41-4	< 10.0
Butanol	71-36-3	< 15.0

TSCA All ingredients are listed or exempted

Proposition 65 This product contains one or more chemicals known to the State of California to cause cancer and/or reproductive toxicity.

15.1.3 Canada Regulations This SDS has been prepared according to the hazard criteria of the *Hazardous Products Regulation* (HPR) (WHMIS 2015) and the SDS contains all of the information required by the HPR.

DSL All ingredients are listed or exempted

15.2 Chemical safety assessment A Chemical Safety Assessment has not been carried out.

Section 16. Other information

Date of issue	10-23-15
Version	2.0
Number	55-C
Date of previous issue	5-28-10
Preparer	Nox-Crete Manufacturing Inc.

Reference Documentation

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that the person receiving them shall make his own determination as to the suitability of the product for his particular purpose and on the condition that he assumes the risk of this use thereof. (NOX-CRETE MANUFACTURING INC)

Full text of R, H and EUH phrases

Flam. Liq. 3	H226: Flammable liquid and vapor
Acute Tox. 4 (oral)	H302: Harmful if swallowed
Asp. Tox. 1	H304: May be fatal if swallowed and enters airways
Skin Irrit. 2	H315: Causes skin irritation
Eye Dam. 1	H318: Causes serious eye damage
Acute Tox. 4 (inhalation)	H332: Harmful if inhaled
STOT SE 3	H335: May cause respiratory irritation
STOT SE 3	H336: May cause drowsiness or dizziness
Carc. 2	H351: Suspected of causing cancer
STOT RE 2 (CNS)(ears)	H373: May cause damage to organs

P201: Obtain special instructions before use.
P202: Do not handle until all safety precautions have been read and understood.
P210: Keep away from heat/sparks/open flames/hot surfaces-No smoking.
P240: Ground/bond container and receiving equipment
P241: Use explosion-proof electrical/ventilating/light/equipment
P242: Use only non-sparking tools
P243: Take precautionary measures against static discharge
P261: Avoid breathing dust/fume/gas/mist/vapors/spray.
P264: Wash exposed area's thoroughly after handling.
P270: Do not eat, drink or smoke when using this product.
P271: Use only outdoors or in a well-ventilated area.
P280: Wear protective gloves/protective clothing/eye protection/face protection.
P301+P310+P330: IF SWALLOWED: Immediately call a POISON CENTER or doctor/physician. Rinse mouth.
P303+P361+P353: IF ON SKIN (or hair): Remove / Take off immediately all contaminated clothing. Rinse skin with water / shower
P304+P340: IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing.
P305+P310: IF IN EYES: Immediately call a POISON CENTER or doctor/physician.
P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses if present and easy to do so - continue rinsing.
P312: Call a POISON CENTER or doctor/physician if you feel unwell.
P331: Do NOT induce vomiting.
P370+P378: In case of fire: Use Dry chemical, foam, carbon dioxide for extinction
P403+P235+P233: Store in a cool well ventilated place. Keep container tightly closed.
P405: Store locked up.
P501: Dispose of contents/container in accordance with local/regional/national/international regulations.

Hazardous Waste Management Training

COMPANY: Nox-Crete Products

1. Waste streams and codes
2. Hazards associated with materials and wastes
3. Universal Waste/Used Oil
4. Labeling
5. Containers
6. Storage limits
7. Satellite accumulation
8. Shipment preparation
9. Manifests
10. Recordkeeping
11. Facility Preparedness
12. Contingency
13. Question and answer

INSTRUCTOR: Jason Barber **DATE:** 3/4/2015

Full Name (Please Print)	Signature
Rob Powers	
Zachary Record	
Vince Huey	
Chris Record 3rd	
Mike Cronin	
Derrick Goldsborough	
Michael Lasher	
Anthony Rugeley	
Brian Allen	
Naing Naing Robert	
Sam Morris	

HAZARDOUS WASTE GENERATOR TRAINING
SIGN-IN SHEET

Company: Nox-Crete	Instructor: Casey Philipp	Date: 4/13/2016

TOPICS COVERED

- Historical Context
- Training Requirements
- Waste Identification
- Waste Evaluation
- Generator Status
- Storage and Inspections
- Satellite Accumulation
- Shipping and Manifests
- Universal Waste and Used Oil
- Facility Preparedness and Emergency Response

I have been present at this environmental training session and understand the issues that have been presented. I have had the opportunity to ask questions and have them answered to my satisfaction.

FULL NAME (PLEASE PRINT)	SIGNATURE
Rob Powell	
Bob Huey	
Vince Huey	
Chris Rexford 2nd	
Mike Cowan	

520 Third Street • Suite 100 • Excelsior, MN 55331 • Phone 952.252.3000 • Fax 952.252.3001
www.uscompliance.com

HAZARDOUS WASTE GENERATOR TRAINING
SIGN-IN SHEET

Company: Nox-Crete Products	Instructor: John Ward (USCC)	Date: 8/17/2017

TOPICS COVERED

- Historical Context
- Training Requirements
- Waste Identification
- Waste Evaluation
- Generator Status
- Storage and Inspections
- Satellite Accumulation
- Shipping and Manifests
- Universal Waste and Used Oil
- Facility Preparedness and Emergency Response

I have been present at this environmental training session and understand the issues that have been presented. I have had the opportunity to ask questions and have them answered to my satisfaction.

FULL NAME (PLEASE PRINT)	SIGNATURE
Vince Hunt	
Bob Huey	
Laura Dooley	
Chris Reverdy Jr	
Mike Cronin	
Eric Hansen	

520 Third Street • Suite 100 • Excelsior, MN 55331 • Phone 952.252.3000 • Fax 952.252.3001
www.uscompliance.com

Evans, Tim

To: Dave MacFarlane
Cc: Michael Linn; mikec@nox-crete.com
Subject: Additional Citations

Hello Mr. MacFarlane,

After further review of information gathered during the October 11 and 12, 2017 inspection, the following citations are being added:

Treating Without a Permit (NOV Added After Inspection) - *According to Title 128, Ch. 12, 001.01 A permit is required for the treatment, storage, or disposal of any hazardous waste identified or listed in Chapters 2 and 3. Owners or operators of hazardous waste management units must have permits during the active life (including the closure period) of the unit.* During inspection of the QC lab/Room 2, I observed a cloth rag placed in a funnel, attached to a HW SAA container of spent laboratory solvents. The SAA container is used to accumulate spent mineral spirits, butanol, xylene, ethyl acetate, isopropyl alcohol, aromatic 100, vmp naptha, and hexane generated as a result of cleaning lab equipment and conducting tests. Waste codes associated with spent laboratory solvents includes D001 and F003. I asked Mr. Moritz how the cloth rag in the funnel was used. Mr. Moritz stated that the cloth rag was used to absorb, primarily, spent VMP naptha, isopropyl alcohol, and ethyl acetate used for cleaning and testing in the lab. I asked Mr. Moritz if the rag served a purpose, such as being used to filter solids from spent solvents. Mr. Moritz stated that spent solvent is poured on the cloth rag to dispose of solvent, through evaporation, and any excess liquid not absorbed by the cloth rag is collected in the SAA container attached to the funnel.

Notification Not Updated (NOV Added After Inspection) - *According to Title 128, Chapter 4, 003.02, Not later than thirty days after any change in the information or status of any person as described to the Department or EPA in Section 003 of this Chapter, such person shall file an amended notification with the Department.* During review of facility documents related to stored HW, I noticed that Nox-Crete had generated greater than 2,200 lbs. of HW in September 2014, December of 2016, and September of 2017. Nox-Crete notified as a Large Quantity Generator (LQG) (generating greater than 2,200 lbs./mo.) for December 2016. However, Nox-Crete had not notified as an LQG, with the State of Nebraska, for HW generated in September 2014 and September 2017.

Please let me know how much time Nox-Crete requires, in order to respond to the two additional citations, listed above.

If you have any questions, or need clarification regarding the citations, please feel free to contact me.

Tim Evans | Life Scientist
Environmental Science & Technology Division | Environmental Field Compliance Branch
Science & Technology Center | U.S. Environmental Protection Agency
300 Minnesota Avenue | Kansas City, KS 66101
Phone 913-551-7663
Evans.Timothy@epa.gov | ww.epa.gov

PHOTO LOG

Facility Name / City:Nox-Crete Manufacturing, Inc. /Omaha, Nebraska
Facility ID #: NED007284128
Date : October 11 and 12, 2017
Photographer: Timothy R. Evans
Type of Camera: Nikon COOLPIX AW100, Serial #: 32167689.
Digital Recording Media: Flashcard
All digital photos were copied by: Tim Evans on October 13, 2017.
All digital photos were copied to: CD-R
Original copy is stored in: CD-R. Digital photos were downloaded to CD-R all by Timothy R. Evans.
No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCNxxxx.jpg)	Description
1	Timothy R. Evans	10/11/17	11:02 AM	0405	Solvent-contaminated paper towels allowed to dry in QC lab/Room 2, prior to disposal in the trash. Mr. Moritz stated that the paper wipes contained
2	Timothy R. Evans	10/11/17	11:03 AM	0406	Two black plastic closed 3-gallon HW satellite accumulation buckets, located in the QC lab. The buckets contained spent/waste solvents. The three translucent plastic containers with blue lids contained test product, and were not considered waste. The cloth rag in the funnel (yellow arrow) is used to absorb spent/waste VMP naptha, ethyl acetate, and isopropyl alcohol generated from testing and cleaning. Spent/waste VMP naptha, ethyl acetate, and isopropyl alcohol are intentionally allowed to dry/evaporate, as a means of disposal. Spent/waste VMP naptha, ethyl acetate, and isopropyl alcohol are intentionally allowed to dry/evaporate, as a means of disposal.
3	Timothy R. Evans	10/11/17	11:15 AM	0408	Solvent-contaminated paper towels allowed to dry in QC lab/Room 2, prior to disposal in the trash. Paper towels typically contain butanol, aromatic 100, xylene, methanol and mineral spirits.
4	Timothy R. Evans	10/11/17	11:29 AM	0411	One 55-gallon HW storage drum containing mixed solvents, located in the less than 180/270 day area of drum storage/Room 3. The drum was not labelled with an accumulation start date.
5	Timothy R. Evans	10/11/17	11:43 AM	0420	This is the same drum in Photo 4. Mr. Cronin marked the drum with the accumulation start date, correcting NOV 2b at the time of the inspection.
6	Timothy R. Evans	10/11/17	11:29 AM	0413	One 55-gallon HW storage drum containing Silcoseal, located in the less than 180/270 day area of drum storage/Room 3. The drum was not labelled with an accumulation start date.
7	Timothy R. Evans	10/11/17	11:39 AM	0414	This is the same drum in Photo 6. Mr. Cronin marked the drum with the accumulation start date, correcting NOV 2a at the time of the inspection.
8	Timothy R. Evans	10/11/17	11:50 AM	0422	One white plastic 5-gallon bucket containing approximately 2.5-gallons of HW Silcoseal in EP Room/Room 5. The bucket was not labelled with the words "Hazardous Waste".
9	Timothy R. Evans	10/11/17	11:51 AM	0423	The Silcoseal concentrate (product) tank, located in EP Room/Room 5, was leaking at the mixer packing gland. Silcoseal was being collected in the 5-gallon bucket in Photo 8.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCNxxxx.jpg)	Description
10	Timothy R. Evans	10/11/17	4:04 PM	0450	During the inspection, Mr. Cronin fixed the leaking mixer packing gland, on the Silcoseal concentrate tank, located in EP Room/Room 5. The HW Silcoseal, in the 5-gallon bucket, was poured into a 55-gallon HW storage drum, correcting NOV 3.
11	Timothy R. Evans	10/11/17	12:07 PM	0424	One metal 1-quart container with approximately six ounces of liquid in EP Room/Room 5 trash can (yellow arrow).
12	Timothy R. Evans	10/11/17	12:08 PM	0426	Close up of metal can in Photo 11. One metal 1-quart container with approximately six ounces of liquid in EP Room/Room 5 trash can.
13	Timothy R. Evans	10/11/17	12:11 PM	0427	Cloth rags used to wipe off tanks, clean up solvent dripping from product tanks, and wipe off employee hands, are allowed to dry on the edge of trash cans, prior to being disposed in the trash. The cloth rags on the trash can in the photo are located in drum storage/Room 3.
14	Timothy R. Evans	10/11/17	12:38 PM	0435	One rusty metal 5-gallon bucket, with white plastic container inside, containing approximately ½-gallon of white crystals and other debris in raw material storage/Room 7.
15	Timothy R. Evans	10/11/17	12:39 PM	0436	One rusty metal 5-gallon bucket, with white plastic container inside, containing approximately ½-gallon of white crystals and other debris in raw material storage/Room 7.
16	Timothy R. Evans	10/11/17	12:40 PM	0437	One rusty metal 5-gallon bucket, with white plastic container inside, containing approximately ½-gallon of white crystals and other debris in raw material storage/Room 7.
17	Timothy R. Evans	10/11/17	12:56 PM	0438	One metal 5-gallon open bucket containing approximately 1 gallon of unknown brown solids and one white plastic 5-gallon open bucket containing approximately 1.5 gallons of red liquid and solids, located in raw material storage/Room 7.
18	Timothy R. Evans	10/11/17	12:58 PM	0439	Close up of Photo 17. One white plastic 5-gallon open bucket containing approximately 1.5 gallons of red liquid and solids, located in raw material storage/Room 7.
19	Timothy R. Evans	10/11/17	12:58 PM	0440	Close up of Photo 17. One metal 5-gallon open bucket containing approximately 1 gallon of unknown brown solids in raw material storage/Room 7.
20	Timothy R. Evans	10/11/17	1:08 PM	0446	One white plastic 5-gallon open bucket containing approximately 5 lbs. of unknown brown solids and nitrile gloves, located in raw material storage/Room 7.
21	Timothy R. Evans	10/11/17	1:08 PM	0445	Close up of Photo 20. One white plastic 5-gallon open bucket containing approximately 5 lbs. of unknown brown solids and nitrile gloves, located in raw material storage/Room 7.
22	Timothy R. Evans	10/11/17	4:38 PM	0451	Fire Evacuation Map, posted in Water Room/ Room 6, adjacent to less than 180/270 day HW storage area, did not list locations of spill control material.
23	Timothy R. Evans	10/11/17	4:51 PM	0452	Updated Fire Evacuation Map showing locations of spill control material locations, correcting NOV 4.
24	Timothy R. Evans	10/12/17	10:29 AM	0453	Fire Evacuation Map posted in Water Room/ Room 6, adjacent to less than 180/270 day HW storage area. The map had been updated with locations of spill control material locations, correcting NOV 4.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCNxxxx.jpg)	Description
PHOTOS NOT USED IN REPORT					
1	Timothy R. Evans	10/11/17	11:04 AM	0407	Two black plastic closed 3-gallon HW satellite accumulation buckets, located in the QC lab. The buckets contained spent/waste solvents. The three translucent plastic
2	Timothy R. Evans	10/11/17	11:17 AM	0409	5-gallon bucket of non-HW liquid mold release agent, located in QC lab.
3	Timothy R. Evans	10/11/17	11:17 AM	0410	5-gallon HW SAA bucket of 50% isopropyl alcohol and 50% soft water, located in the QC lab.
4	Timothy R. Evans	10/11/17	11:29 AM	0412	55-gallon HW storage drums containing Silcoseal, mixed solvents, and located in the
5	Timothy R. Evans	10/11/17	11:39 AM	0415	Blurry photo of one 55-gallon HW storage drum containing Silcoseal, located in the less than 180/270 day area of drum storage/Room 3. The drum was not labelled with an accumulation start date.
6	Timothy R. Evans	10/11/17	11:41 AM	0416	Overhead pipe used to transfer butanol product to production area.
7	Timothy R. Evans	10/11/17	11:41 AM	0417	Butanol product dripping on the floor next to HW storage drums in the less than 180/270 day area, drum storage/Room 3.
8	Timothy R. Evans	10/11/17	11:42 AM	0418	55-gallon HW storage drums containing Silcoseal, mixed solvents, and located in the less than 180/270 day area of drum storage/Room 3.
9	Timothy R. Evans	10/11/17	11:42 AM	0419	Butanol product dripping on the floor next to HW storage drums in the less than 180/270 day area, drum storage/Room 3.
10	Timothy R. Evans	10/11/17	11:50 AM	0421	One white plastic 5-gallon bucket containing approximately 2.5-gallons of HW Silcoseal in EP Room/Room 5. The bucket was not labelled with the words "Hazardous Waste".
11	Timothy R. Evans	10/11/17	12:07 PM	0425	One metal 1-quart container with approximately six ounces of liquid in EP Room/Room 5 trash can.
12	Timothy R. Evans	10/11/17	12:30 PM	0428	One white plastic 5-gallon bucket containing approximately 4-gallons of non-hazardous vacuum condensate, in Water Room/ Room 6.
13	Timothy R. Evans	10/11/17	12:30 PM	0429	One white plastic 5-gallon bucket containing approximately 4-gallons of non-hazardous vacuum condensate, in Water Room/ Room 6.
14	Timothy R. Evans	10/11/17	12:30 PM	0430	One white plastic 5-gallon bucket containing approximately 4-gallons of non-hazardous vacuum condensate, in Water Room/ Room 6.
15	Timothy R. Evans	10/11/17	12:30 PM	0431	One white plastic 5-gallon bucket containing approximately 4-gallons of non-hazardous vacuum condensate, in Water Room/ Room 6.
16	Timothy R. Evans	10/11/17	12:35 PM	0432	Two 5-gallon plastic buckets containing non-hazardous water-based waste.
17	Timothy R. Evans	10/11/17	12:35 PM	0433	Two 5-gallon plastic buckets containing non-hazardous water-based waste.
18	Timothy R. Evans	10/11/17	12:38 PM	0434	One rusty metal 5-gallon bucket, with white plastic container inside, containing approximately ½-gallon of white crystals and other debris in raw material storage/Room 7. the rusty bucket was sitting a pallet with buckets of useable product.
19	Timothy R. Evans	10/11/17	1:00 PM	0441	Two 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank. The two white plastic 5-gallon buckets in the photo were empty.
20	Timothy R. Evans	10/11/17	1:00 PM	0442	One 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank.

Report Photo #	Photographer	Date	Approx. Time	File Name (DSCNxxxx.jpg)	Description
21	Timothy R. Evans	10/11/17	1:00 PM	0443	One 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank.
22	Timothy R. Evans	10/11/17	1:00 PM	0444	One 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank.
23	Timothy R. Evans	10/11/17	1:12 PM	0447	One 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank.
24	Timothy R. Evans	10/11/17	1:12 PM	0448	One 5-gallon metal buckets of Bio-Clean drippings, collected from packaging. The Bio-Clean was still considered product and was intended to be poured back into a product tank.
25	Timothy R. Evans	10/11/17	4:04 PM	0449	During the inspection, Mr. Cronin fixed the leaking mixer packing gland, on the Silcoseal concentrate tank, located in EP Room/Room 5. The HW Silcoseal, in the 5-gallon bucket, was poured into a 55-gallon HW storage drum, correcting NOV 3.